

EXHIBIT

A

JS 44 (Rev. 11/15)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Perry Bonin, Ace Chandler and Michael Manuel, et al

DEFENDANTS

Sabine River Authority of Texas and Sabine River Authority, State of Louisiana

(b) County of Residence of First Listed Plaintiff Newton
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Orange
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)
Glen W. Morgan, Adam Nichols, and John Werner

Reaud, Morgan & Quinn, L.L.P., 801 Laurel Street, P. O. Box 26005,
Beaumont, Texas 77720-6005

Attorneys (If Known)

Lawrence L. Germer, Charles W. Goehring, Jr., and Kelli B. Smith
Germer PLLC, P. O. Box 4915
Beaumont, Texas 77704-4915

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input checked="" type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS <input type="checkbox"/> Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding ☒ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
16 U.S.C. §825p. Claims pre-empted by Federal Power Act

Brief description of cause:
Plaintiffs allege state constitutional takings claims.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$

CHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

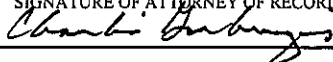
JUDGE

DOCKET NUMBER

DATE

5/26/2016

SIGNATURE OF ATTORNEY OF RECORD



FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

CIVIL DOCKET

[illegible]

State of Texas
County of Orange

I, VICKIE EDGERLY, Clerk of the District Court in and for Orange County, Texas, do hereby certify that the above and foregoing is a true and correct copy of the Original Hereof, as same was filed and appears of record in my office.

Witness my official seal and signature of office
Orange, Texas, this the 25 day of May 2016

VICKIE EDGERLY

VICKIE EDGEMAN
Clerk of District Court

of Orange County, Texas
by John F. [Signature]

ANNE REED



ORDER OF COURT												
DATE												

CIVIL CASE INFORMATION SHEET B160137-C 163rd

CAUSE NUMBER (FOR CLERK USE ONLY):

COURT (FOR CLERK USE ONLY):

FILED: 4/20/2016 5:37:39 PM
Vickie Edgerly, District Clerk
Orange County, Texas
By: Denise Smith, Deputy

STYLED Perry Bonin, Ace Chandler and Michael Manuel, et al vs. Sabine River Authority of Texas and Sabine River Authority of Louisiana
(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

1. Contact information for person completing case information sheet: Name: <u>John Werner</u> Email: <u>jwerner@rmqlawfirm.com</u> Address: <u>801 Laurel St.</u> Telephone: <u>409-838-1000</u> <u>Beaumont, TX 77701</u> Fax: <u>409-833-8236</u> Signature: <u>John Werner</u> State Bar No: <u>00787920</u>		Names of parties in case: Plaintiff(s)/Petitioner(s): <u>Perry Bonin, Ace Chandler and</u> <u>Michael Manuel, et al (Ex A B C)</u> Defendant(s)/Respondent(s): <u>Sabine River Authority of Texas</u> <u>and Sabine River Authority of</u> <u>Louisiana</u> (Attach additional page as necessary to list all parties)		Person or entity completing sheet is: <input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: _____ Additional Parties in Child Support Case: Custodial Parent: _____ Non-Custodial Parent: _____ Presumed Father: _____	
2. Indicate case type, or identify the most important issue in the case (select only 1):					
Civil			Family Law		
Contract <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: Foreclosure <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract:	Injury or Damage <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation Malpractice <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: <input type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises Product Liability <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: <input type="checkbox"/> Other Injury or Damage:	Real Property <input checked="" type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: Related to Criminal Matters <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other:	Marriage Relationship <input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void Divorce <input type="checkbox"/> With Children <input type="checkbox"/> No Children Other Family Law <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other:	Post-Judgment/Actions (non-Title IV-D) <input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other Title IV-D <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocity (UIFSA) <input type="checkbox"/> Support Order Parent-Child Relationship <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child:	
Employment <input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment:		Other Civil <input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other:			
Tax <input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax		Probate & Mental Health Probate/Wills/Intestate Administration <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other:			
3. Indicate procedure or remedy, if applicable (may select more than 1):					
<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action		<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment		<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover	
4. Indicate damages sought (do not select if it is a family law case): <input type="checkbox"/> Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees <input type="checkbox"/> Less than \$100,000 and non-monetary relief <input type="checkbox"/> Over \$100,000 but not more than \$200,000 <input type="checkbox"/> Over \$200,000 but not more than \$1,000,000 <input checked="" type="checkbox"/> Over \$1,000,000					

FILED: 4/29/2016 11:16:36 AM
Vickie Edgerly, District Clerk
Orange County, Texas
By: Denise Smith, Deputy

CIVIL CITATION – CITCVWD

THE STATE OF TEXAS

To: Sabine River Authority of Texas
12777 N. Highway 87
Orange TX 77632

Defendant, NOTICE:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A. M. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

Said **ANSWER** may be filed with the District Clerk's Office, Orange County Courthouse, 801 W Division Ave, Orange Texas 77630.

Said **PLAINTIFF'S ORIGINAL PETITION**

was filed and docketed in the Honorable 163rd District Court of Orange County, Texas at the District Clerk's Office at the Orange County Courthouse, 801 W Division Ave, Orange, Texas on April 20, 2016 in the following styled and numbered cause:

Cause No: 160137-C

Perry Bonin et al VS. Sabine River Authority of Texas et al

The name and address of the attorney for plaintiff otherwise the address of Plaintiff is:

Glen Morgan
P.O. BOX 26005
BEAUMONT TX 77720-6005

ISSUED AND GIVEN under my hand and seal of said Court at Orange, Texas, this April 27, 2016.



VICKIE EDGERLY, District Clerk
Orange County, Texas

Vickie Edgerly

RETURN

Came to hand on the _____ day of _____, 20____, at _____ o'clock _____, M., and executed in _____ County, Texas, at _____ o'clock _____ M., on the _____ day of _____, 20____, by delivering, in accordance with the requirements of law, to the within named _____ In person, a true copy of this citation together with the accompanying copy of the petition, having first endorsed thereon the date of delivery.

And not executed as to the defendant _____
the diligence used to execute being _____
the cause of failure to execute is _____
the defendant may be found _____

TOTAL FEES: _____

BY: _____

AFFIDAVIT ATTACHED

CAUSE NO. 160137-C

PERRY BONIN ET AL

Plaintiff,

VS.

SABINE RIVER AUTHORITY OF TEXAS ET AL

Defendant.

§
§
§
§
§
§
§

IN THE COURT OF

ORANGE COUNTY, TEXAS

163RD DISTRICT

AFFIDAVIT OF SERVICE

On this day personally appeared Jerrie Meza who, being by me duly sworn, deposed and said:

"The following came to hand on Apr 28, 2016, 2:40 pm,

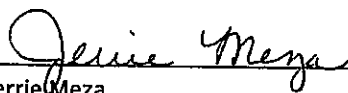
CITATION AND PLAINTIFF'S ORIGINAL PETITION,

and was executed at 12777 N. HIGHWAY 87, ORANGE, TX 77632 within the county of ORANGE at 04:10 PM on Thu, Apr 28 2016, by delivering a true copy to the within named

SABINE RIVER AUTHORITY OF TEXAS / DANNY CHOATE

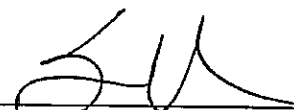
In person, having first endorsed the date of delivery on same.

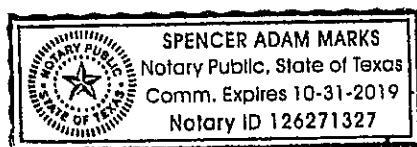
I am a person over eighteen (18) years of age and I am competent to make this affidavit. I am a resident of the State of Texas. I am familiar with the Texas Rules of Civil Procedure as they apply to service of Process. I am not a party to this suit nor related or affiliated with any herein, and have no interest in the outcome of the suit. I have never been convicted of a felony or of a misdemeanor involving moral turpitude. I have personal knowledge of the facts stated herein and they are true and correct."


Jerrie Meza
SCH11322 EXP: 01/31/2018

BEFORE ME, a Notary Public, on this day personally appeared Jerrie Meza, known to me to be the person whose name is subscribed to the foregoing document and, being by me first duly sworn, declared that the statements therein contained are within his or her personal knowledge and are true and correct.

SUBSCRIBED AND SWORN TO ME ON 4/29/2016


Notary Public, State of Texas



04/29/16 13:39:36 Orange Cty DC Scanned by Denise

CIVIL CITATION - CITCVWD

THE STATE OF TEXAS

To: Sabine River Authority of Louisiana
8585 Archives Ave
Baton Rouge LA 70809

BY SERVING THE SECRETARY OF THE STATE OF LOUISIANA

Defendant, NOTICE:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A. M. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

Said ANSWER may be filed with the District Clerk's Office, Orange County Courthouse, 801 W Division Ave, Orange Texas 77630.

Said PLAINTIFF'S ORIGINAL PETITION

was filed and docketed in the Honorable 163rd District Court of Orange County, Texas at the District Clerk's Office at the Orange County Courthouse, 801 W Division Ave, Orange, Texas on April 20, 2016 in the following styled and numbered cause:

Cause No: 160137-C

Perry Bonin et al VS. Sabine River Authority of Texas et al

The name and address of the attorney for plaintiff otherwise the address of Plaintiff is:

Glen Morgan
P.O. BOX 26005
BEAUMONT TX 77720-6005

ISSUED AND GIVEN under my hand and seal of said Court at Orange, Texas, this April 29, 2016.



VICKIE EDGERLY, District Clerk
Orange County, Texas

Vickie Edgerly

RETURN

Came to hand on the _____ day of _____, 20____, at _____ o'clock _____, M., and executed in _____ County, Texas, at _____ o'clock _____ M., on the _____ day of _____, 20____, by delivering, in accordance with the requirements of law, to the within named _____ In person, a true copy of this citation together with the accompanying copy of the petition, having first endorsed thereon the date of delivery.

And not executed as to the defendant _____
the diligence used to execute being _____
the cause of failure to execute is _____
the defendant may be found _____

TOTAL FEES: _____

BY: _____

04/27/16 15:14:58 Orange Cty DC Scanned by Denise

CIVIL CITATION – CITCVWD

THE STATE OF TEXAS

To: Sabine River Authority of Louisiana
8585 Archives Ave
Baton Rouge, LA 70809

Defendant, NOTICE:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A. M. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

Said ANSWER may be filed with the District Clerk's Office, Orange County Courthouse, 801 W Division Ave, Orange Texas 77630.

Said

PLAINTIFF'S ORIGINAL PETITION

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Cause No: 160137-C

Perry Bonin et al VS. Sabine River Authority of Texas et al

The name and address of the attorney for plaintiff otherwise the address of Plaintiff is:

Glen Morgan
P.O. BOX 26005
BEAUMONT TX 77720-6005

ISSUED AND GIVEN under my hand and seal of said Court at Orange, Texas, this April 27, 2016.



VICKIE EDGERLY, District Clerk
Orange County, Texas

Vickie Edgerly

RETURN

Came to hand on the _____ day of _____, 20____, at _____ o'clock _____, M., and executed in _____ County, Texas, at _____ o'clock _____ M., on the _____ day of _____, 20____, by delivering, in accordance with the requirements of law, to the within named _____ In person, a true copy of this citation together with the accompanying copy of the petition, having first endorsed thereon the date of delivery.

And not executed as to the defendant _____
the diligence used to execute being _____
the cause of failure to execute is _____
the defendant may be found _____

TOTAL FEES: _____

BY: _____

04/27/16 15:15:01 Orange Cty DC Scanned by Denise

CIVIL CITATION – CITCVWD

THE STATE OF TEXAS

To: Sabine River Authority of Texas
12777 N. Highway 87
Orange TX 77632

Defendant, NOTICE:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A. M. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

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Cause No: 160137-C

Perry Bonin et al VS. Sabine River Authority of Texas et al

The name and address of the attorney for plaintiff otherwise the address of Plaintiff is:

Glen Morgan
P.O. BOX 26005
BEAUMONT TX 77720-6005

ISSUED AND GIVEN under my hand and seal of said Court at Orange, Texas, this April 27, 2016.



VICKIE EDGERLY, District Clerk
Orange County, Texas

Vickie Edgerly

RETURN

Came to hand on the ____ day of ____, 20____, at ____ o'clock ____, M., and executed in ____ County, Texas, at ____ o'clock ____, M., on the ____ day of ____, 20____, by delivering, in accordance with the requirements of law, to the within named ____ In person, a true copy of this citation together with the accompanying copy of the petition, having first endorsed thereon the date of delivery.

And not executed as to the defendant ____
the diligence used to execute being ____
the cause of failure to execute is ____
the defendant may be found ____

TOTAL FEES: ____

BY: ____

05/05/16 10:36:52 Orange Cty DC Scanned by Denise

04/27/16 15:15:04 Orange Cty DC Scanned by Denise

From: Denise Smith
To: "dmarquardt@mglawfirm.com"
Subject: B160137-C Bonin Service
Date: Wednesday, April 27, 2016 3:13:00 PM
Attachments: CIT 1.pdf
CIT.pdf
Importance: High

Attached are your citations in the above referenced case. Please print 2 copies of each citation and attach the Original Petition to one copy of each citation before forwarding for service.

Please acknowledge receipt of this service for our records.

If you have any questions please feel free to call.

Thank you

Denise Smith

(409) 882-7832

05/05/16 10:36:54 Orange Cty DC Scanned by Denise

04/28/16 11:03:19 Orange Cty DC Scanned by Denise

From: Heather McAdams
To: Denise Smith
Subject: RE: B160137-C Bonin Service
Date: Tuesday, April 26, 2016 9:55:47 AM

Thank you very much for your assistance.

Heather McAdams | Paralegal
The Coffman Law Firm
First City Building
505 Orleans | Fifth Floor
Beaumont, Texas 77701
T. 409.833.7700 | F. 866.835.8250
hmcadams@coffmanlawfirm.com
www.coffmanlawfirm.com

CONFIDENTIALITY NOTICE: This email may contain confidential or privileged information. If you believe you received it in error, please notify the sender immediately at 409.833.7700, and delete this message without copying or disclosing it. This communication does not reflect an intention by the sender or the sender's agent or representative to conduct a transaction, make any agreement or enter into an attorney-client relationship by electronic means, nor has such occurred.

From: Denise Smith [mailto:dsmith@co.orange.tx.us]
Sent: Tuesday, April 26, 2016 9:53 AM
To: Heather McAdams <hmcadams@coffmanlawfirm.com>
Subject: B160137-C Bonin Service

Attached is the Original Petition you requested.

Thank you Denise Smith 409/882/7832

CIVIL CITATION – CITCVWD

THE STATE OF TEXAS

To: Sabine River Authority of Louisiana
BY SERVING IT'S DIRECTOR OR OFFICER
15091 TEXAS HWY
MANY LA 71449

Defendant, NOTICE:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A. M. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

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was filed and docketed in the Honorable 163rd District Court of Orange County, Texas at the District Clerk's Office at the Orange County Courthouse, 801 W Division Ave, Orange, Texas on April 20, 2016 in the following styled and numbered cause:

Cause No: 160137-C

Perry Bonin et al VS. Sabine River Authority of Texas et al

The name and address of the attorney for plaintiff otherwise the address of Plaintiff is:

Glen Morgan
P.O. BOX 26005
BEAUMONT TX 77720-6005

ISSUED AND GIVEN under my hand and seal of said Court at Orange, Texas, this May 12, 2016.



VICKIE EDGERLY, District Clerk
Orange County, Texas

Vickie Edgerly

RETURN

Came to hand on the _____ day of _____, 20____, at _____ o'clock _____, M., and executed in _____ County, Texas, at _____ o'clock _____ M., on the _____ day of _____, 20____, by delivering, in accordance with the requirements of law, to the within named _____ In person, a true copy of this citation together with the accompanying copy of the petition, having first endorsed thereon the date of delivery.

And not executed as to the defendant _____
the diligence used to execute being _____
the cause of failure to execute is _____
the defendant may be found _____

TOTAL FEES: _____

BY: _____

From: Denise Smith
To: "DMARGUARDT@RMGLAWFIRM.COM"
Subject: B160137-C BONIN SERVICE
Date: Thursday, May 12, 2016 2:45:00 PM
Attachments: P324A2.pdf
Importance: High

Attached is your citation in the above referenced case. Please print 2 copies and attach the Original Petition to one before forwarding for service.

Please acknowledge receipt of this service for our records.

If you have any questions please feel free to call.

Thank you,

Denise Smith

409/882/7832

From: Danyel Marquardt
To: Denise Smith
Subject: RE: 160137-C BONIN SERVICE
Date: Thursday, May 12, 2016 3:46:09 PM

Thank you Denise!

From: Denise Smith [mailto:dsmith@co.orange.tx.us]
Sent: Thursday, May 12, 2016 3:44 PM
To: 'Danyel Marquardt' <dmarquardt@rmqlawfirm.com>
Subject: 160137-C BONIN SERVICE

Attached is your citation in the above referenced case. Please print 2 copies and attach the Original Petition to one before forwarding for service.

Please acknowledge receipt of this service for our records.

If you have any questions please feel free to call.

Thank you, Denise Smith

409/882/7832

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Certified Payments - Payment Screens - Step 10

Page 1 of 1

CERTIFIED PAYMENTS - PRINT RECEIPT

Orange County, TX District Clerk
5002581

Payment ID	Cause Number or Description of Payment	Payment Amount	Conv Fee	Total	Status
100137366619	B160137-C ar copies	\$16 00	\$1 00	\$17 00	04/25/16 1 39 PM 08263B
		\$16 00	\$1 00	\$17 00	

BUREAU INFORMATION

First Name ERIC
Middle Name A
Last Name BESSON
Name Suffix
Telephone 409-838-2808
Address 5705 KRISTIN LANE
City BEAUMONT
State Texas
Zip Code 77713
Country United States

BILLING INFORMATION

First Name ERIC
Middle Name A
Last Name BESSON
Name Suffix
Telephone 409-838-2808
Address 5705 KRISTIN LANE
City BEAUMONT
State Texas
Zip Code 77713
Country United States

CREDIT CARD INFORMATION

Card Visa
Type
Exp xx / xxxx
Date
Email ebesson@beaumontenterprise.com
Address
Card Number xxxxxxxxxxxx4366
Security Code Hidden for Security

CERTIFIED PAYMENTS - PRINT RECEIPT

Orange County, TX District Clerk
5002581

Payment ID	Cause Number or Description of Payment	Payment Amount	Conv Fee	Total	Status
100137395258	Copies B160137-C	\$20.00	\$1.00	\$21.00	04/26/16 9:42 AM 287000
		\$20.00	\$1.00	\$21.00	

Orange County, Texas
District Clerk
Vickie Edgerly

16 APR 26 09:43

FILED
VICKIE EDGERLY

BUREAU INFORMATION

First Name Scott
Middle Name
Last Name Lawrence
Name Suffix
Telephone 409-673-3406
Address 2955 Interstate 10 East
City BEAUMONT
State Texas
Zip Code 77702
Country United States

BILLING INFORMATION

First Name Scott
Middle Name
Last Name Lawrence
Name Suffix
Telephone 409-673-3406
Address 2955 Interstate 10 East
City BEAUMONT
State Texas
Zip Code 77702
Country United States

CREDIT CARD INFORMATION

Card Type	American Express	Card Number	xxxxxxxxxxxx1009
Exp. Date	xx / xxxx	Security Code	Hidden for Security
Email Address	adevriend@sbgty.com		

\$15.00 Copies
\$ 5.00 Search

Charlean Lindsey

From: Charlean Lindsey <clindsey@co.orange.tx.us>
Sent: Tuesday, April 26, 2016 10:13 AM
To: 'news@kfdm.com'
Subject: 8160137-C Perry Bonin Et Al VS Sabine River Authority Of Texas Et Al
Attachments: PDF0668

Attached is a Copy of the Petition in the above referenced cause.

Please acknowledge receipt of this service for our records.

Please call if any questions or problems viewing this document.

Thank you,
Charlean Lindsey
Deputy Clerk

Orange County District Clerk's Office
801 W Division Ave
Orange, Texas 77630
409-882-7064

CERTIFIED PAYMENTS - PRINT RECEIPT

Orange County, TX District Clerk
5002581

Payment ID	Cause Number or Description of Payment	Payment Amount	Conv Fee	Total	Status
100137395778	B160137-C	\$20.00	\$1.00	\$21.00	04/26/16 9:50 AM 285014
		\$20.00	\$1.00	\$21.00	

Vickie Egerly
DISTRICT CLERK
ORANGE COUNTY, TEXAS

16 APR 26 A9 56

FILED
VICKIE EGERLY

BUREAU INFORMATION

First Name Richard
Middle Name L
Last Name Coffman
Name Suffix
Telephone 409/833/7700
Address 505 Orleans
City BEAUMONT
State Texas
Zip Code 77701
Country United States

BILLING INFORMATION

First Name Richard
Middle Name L
Last Name Coffman
Name Suffix
Telephone 409/833/7700
Address 505 Orleans
City BEAUMONT
State Texas
Zip Code 77701
Country United States

CREDIT CARD INFORMATION

Card Type	American Express	Card Number	xxxxxxxxxxxx5009
Exp. Date	xx / xxxx	Security Code	Hidden for Security
Email	hmcadams@coffmanlawfirm.com		
Address			

From: Denise Smith
To: "ALISSA@APL3.COM"
Subject: RECEIPT AND COPYS
Date: Monday, May 02, 2016 8:43:00 AM
Attachments: PAYMENT.pdf,
PDF9061.pdf

A TTACHED ARE YOUR COPIES AND RECEIPT THAT YOU REQUESTED.

THANK YOU DENISE SMITH 409/882/7832

FILED: 5/2/2016 10:13:59 AM
Vickie Edgerly, District Clerk
Orange County, Texas
By: Denise Smith, Deputy



Vickie Edgerly
Orange County District Clerk
801 W. Division Ave.
Orange, Texas 77630-6364
Phone: (409) 882-7825
Fax: (409) 882-7083



Crystal Thompson
Chief Deputy - Civil

Anne Reed
Chief Deputy - Criminal

E-FILING REQUEST FOR COPIES

CAUSE #: B160137-C # OF COPIES

1) INSTRUMENT: Original Petition with Exhibits 1

2) INSTRUMENT: _____

3) INSTRUMENT: _____

PARTY REQUESTING COPIES: Frank D. Calvert

MONEY: \$ _____ \$ _____
PAID DUE

OTHER INSTRUCTIONS:
Please -email to Cfertitta@calvert-eaves.com

COPY LOG SHEET

<u>DATE</u>	<u>STATUS</u>	<u>CLERK'S INITIAL'S</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Filing Description	Request for Copies of Original Petition and Exhibits
Reference Number	FDC - Firm -Sabine River Authority
Comments	Please provide us with copies of the Original Petition and Exhibits
Status	Accepted
Accepted Date	05/02/2016 11:20:33 AM
Fees	
Court Fee	\$15.00
Service Fee	\$0.00
 Optional Services	
>Copies - Service	\$15.00 (15 x \$1.00)
Documents	
<i>Lead Document</i>	efiling-Request for Copies.pdf.pdf <u>[Original]</u> <u>[Transmitted]</u>

FILED: 4/20/2016 6:01:22 PM
Vickie Edgerly, District Clerk
Orange County, Texas
By: Denise Smith, Deputy

REAUD, MORGAN & QUINN, L.L.P.

Glen W. Morgan
Cris Quinn (1955-2002)
Curtis W. Leister
John Werner
Mark Frasher
Adam Nichols
Sheigh Summerlin Rhodes
Taylor Miller

LAWYERS

801 Laurel Street
P. O. Box 26005
Beaumont, Texas 77720-6005

Wayne A. Reaud
Of Counsel

Phone (409) 838-1000
Fax (409) 833-8236

Don Burgess
Of Counsel

Rodney G. Ellis
Of Counsel

B160137-C

April 20, 2016

District Clerk
Orange County

RE: BONIN, CHANDLER & MANUEL, ET AL VS. SABINE RIVER AUTHORITY OF TEXAS AND
SABINE RIVER AUTHORITY OF LOUISIANA

Dear District Clerk:

Please accept these Exhibits as attachments to Plaintiffs' Original Petition originally filed in Envelope 10222727 on 4/20/16 at 5:19pm and again in Envelope 10223254 on 4/20/16 at 5:37pm.

I apologize for my mistake not attaching them when I resubmitted the Civil Case Information Sheet as a searchable document.

Please feel free to contact me if you have any questions or concerns.

Very truly yours,

REAUD, MORGAN & QUINN, L.L.P.

By: Danyel Marquardt

Danyel Marquardt
Senior Legal Assistant

/dm

FILED: 5/23/2016 9:10:24 AM
Vickie Edgerly, District Clerk
Orange County, Texas
By: Denise Smith, Deputy

CAUSE NO. B160137-C

PERRY BONIN, ACE CHANDLER AND MICHAEL MANUEL, ET AL	§	IN THE DISTRICT COURT OF
	§	
	§	
VS.	§	ORANGE COUNTY, TEXAS
	§	
SABINE RIVER AUTHORITY OF TEXAS and SABINE RIVER AUTHORITY OF LOUISIANA	§	
	§	
	§	163 rd JUDICIAL DISTRICT

**ORIGINAL ANSWER OF DEFENDANT SABINE RIVER
AUTHORITY OF TEXAS TO PLAINTIFFS' ORIGINAL PETITION**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW SABINE RIVER AUTHORITY OF TEXAS, one of the Defendants in the above cause of action, and files this, its Original Answer to Plaintiffs' Original Petition and all subsequent amendments thereto:

I.

Defendant asserts a general denial pursuant to Rule 92 of the Texas Rules of Civil Procedure and respectfully demands that this Court require Plaintiffs to prove each and every element of their causes of action asserted herein against this Defendant as required by the laws and Constitution of the State of Texas.

II.

Defendant specifically denies that Plaintiffs can establish the elements of any valid claim under the Texas Constitution or Texas law, because Defendant's actions did not proximately cause or exacerbate Plaintiffs' damages.

III.

Defendant is a unit of local government of the State of Texas and is immune from the claims in Plaintiffs' Original Petition. Such immunity exists not for the benefit of the Defendant

itself, but for the people of the state and the State of Texas.

IV.

Defendant would further show the claims in Plaintiffs' Original Petition are governed and/or preempted by federal law including, but not limited to, the Federal Power Act ("FPA"). The actions of which Plaintiffs complain were mandated and in compliance with federal law and federal control of the Toledo Bend reservoir. Accordingly, Defendant will promptly remove this matter to the appropriate forum, the United States District Court for the Eastern District of Texas and, upon removal, Defendant will file appropriate briefing demonstrating that Plaintiffs' claims fail to state, and cannot state, a claim upon which relief may be granted.

V.

Defendant reserves its rights to assert other and further defenses in this cause of action by way of amended or supplemental answers as it may deem necessary.

VI.

Defendant requests a trial by jury. The jury fee has been paid.

WHEREFORE, PREMISES CONSIDERED, Defendant, **SABINE RIVER AUTHORITY OF TEXAS**, respectfully prays that Plaintiffs take nothing by way of all claims and causes of action asserted against this Defendant and that this Defendant recover its costs of court expended in defense of this matter and all other relief, both general and special, at law and in equity to which this Defendant is entitled.

Respectfully submitted,

GERMER PLLC
Post Office Box 4915
Beaumont, Texas 77704-4915
(409) 654-6700 – Telephone
(409) 835-2115 – Telecopier

By:



Lawrence L. Germer
Texas Bar No. 07824000
llgermer@germer.com
Charles W. Goehringer, Jr.
Texas Bar No. 00793817
cwgoehringer@germer.com
Kelli B. Smith
Texas Bar. No. 24008053
ksmith@germer.com

**ATTORNEYS FOR DEFENDANT,
SABINE RIVER AUTHORITY OF TEXAS**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing instrument was forwarded to all parties in this case on this the 23rd day of May, 2016.



CHARLES W. GOEHRINGER, JR.

[Print this page](#)

Case # B160137-C - PERRY BONIN et al VS SABINE RIVER AUTHORITY OF TEXAS et al (163rd Judge DENNIS POWELL)

Case Information

Location	Orange County - District Clerk
Date Filed	04/20/2016 05:37:39 PM
Case Number	B160137-C
Case Description	PERRY BONIN et al VS SABINE RIVER AUTHORITY OF TEXAS et al
Assigned to Judge	163rd Judge DENNIS POWELL
Attorney	Glen Morgan
Firm Name	Reaud Morgan & Quinn, LLP
Filed By	Danyel Marquardt
Filer Type	Not Applicable
Damages Sought	Over \$1,000,000

Fees

Convenience Fee	\$8.73
Total Court Case Fees	\$262.00
Total Court Party Fees	\$0.00
Total Court Filing Fees	\$40.00
Total Court Service Fees	\$0.00
Total Filing & Service Fees	\$0.00
Total Service Tax Fees	\$0.00
Total Provider Service Fees	\$0.00
Total Provider Tax Fees	\$0.00
Grand Total	\$310.73

Payment

Account Name	Visa
Transaction Amount	\$310.73
Transaction Response	Approved
Transaction ID	16576109
Order #	010223254-0

Petition

Filing Type	EFile
Filing Code	Petition
Filing Description	CIVIL CASE INFORMATION SHEET
Reference Number	FLOOD CASES
Comments	RESUBMISSION, 10222727, 4/20/16 5:19PM
Status	Accepted
Accepted Date	04/22/2016 11:56:56 AM

Fees

Court Fee	\$0.00
Service Fee	\$0.00

Documents

<i>Lead Document</i>	civ.PDF	<u>[Original]</u>	<u>[Transmitted]</u>
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Petition

Filing Type	EFile
Filing Code	Petition
Filing Description	PLAINTIFFS ORIGINAL PETITION
Reference Number	FLOOD CASES
Comments	RESUBMISSION, 10222727, 4/20/16 5:19PM
Status	Accepted
Accepted Date	04/22/2016 11:56:56 AM

Fees

Court Fee	\$40.00
Service Fee	\$0.00

Optional Services

>Jury Fee	\$40.00
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Documents

<i>Lead Document</i>	160420 Plaintiffs Original Petition.pdf	<u>[Original]</u> <u>[Transmitted]</u>
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CERTIFIED PAYMENTS - PRINT RECEIPT

Orange County, TX District Clerk
5002581

Payment ID	Cause Number or Description of Payment	Payment Amount	Conv Fee	Total	Status
100137306946	[REDACTED]	\$125.00	\$5.00	\$130.00	04/22/16 11:47 AM 963781
		\$125.00	\$5.00	\$130.00	



BUREAU INFORMATION

First Name GLENN
Middle Name W
Last Name MORGAN
Name Suffix
Telephone 409-838-1000
Address P O BOX 26005
City BEAUMONT
State Texas
Zip Code 77720
Country United States

BILLING INFORMATION

First Name GLENN
Middle Name W
Last Name MORGAN
Name Suffix
Telephone 409-838-1000
Address P O BOX 26005
City BEAUMONT
State Texas
Zip Code 77720
Country United States

*Additional
Plaintiffs
Fees*

*VE will
have to
create a
code
for this*

CREDIT CARD INFORMATION

Card Type Visa
Card Number xxxxxxxxxxxx9556
Exp. Date xx / xxxx
Security Code Hidden for Security
Email Address sreeves@rmqlawfirm.com

[Print this page](#)

Case # B160137-C - Perry Bonin et al VS Savine River Authority of Texas et al (163rd Judge Dennis Powell)

Case Information

Location	Orange County - District Clerk
Date Filed	04/25/2016 01:18:40 PM
Case Number	B160137-C
Case Description	Perry Bonin et al VS Savine River Authority of Texas et al
Assigned to Judge	163rd Judge Dennis Powell
Attorney	Glen Morgan
Firm Name	Reaud Morgan & Quinn, LLP
Filed By	Danyel Marquardt
Filer Type	Not Applicable

Fees

Convenience Fee	\$0.46
Total Court Case Fees	\$0.00
Total Court Party Fees	\$0.00
Total Court Filing Fees	\$16.00
Total Court Service Fees	\$0.00
Total Filing & Service Fees	\$0.00
Total Service Tax Fees	\$0.00
Total Provider Service Fees	\$0.00
Total Provider Tax Fees	\$0.00
Grand Total	\$16.46

Payment

Account Name	Visa
Transaction Amount	\$16.46
Transaction Response	Approved
Transaction ID	16657162
Order #	010284005-0

Request

Filing Type	EFile
Filing Code	Request

Filing Description	Request for Process
Reference Number	SRA
Comments	Please prepare citations and return to me for service. Thank you.
Status	Accepted
Accepted Date	04/26/2016 01:37:36 PM
Fees	
Court Fee	\$16.00
Service Fee	\$0.00

Optional Services	
>Issue Citation	\$16.00 (2 x \$8.00)

Documents

<i>Lead Document</i>	serv.sra.PDF	<u>[Original]</u>	<u>[Transmitted]</u>
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[Print this page](#)

Case # B160137-C - Perry Bonin et al VS Savine River Authority of Texas et al (163rd Judge Dennis Powell)

Case Information

Location	Orange County - District Clerk
Date Filed	05/11/2016 05:42:00 PM
Case Number	B160137-C
Case Description	Perry Bonin et al VS Savine River Authority of Texas et al
Assigned to Judge	163rd Judge Dennis Powell
Attorney	Adam Nichols
Firm Name	Reaud Morgan & Quinn, LLP
Filed By	Danyel Marquardt
Filer Type	Not Applicable

Fees

Convenience Fee	\$0.23
Total Court Case Fees	\$0.00
Total Court Party Fees	\$0.00
Total Court Filing Fees	\$8.00
Total Court Service Fees	\$0.00
Total Filing & Service Fees	\$0.00
Total Service Tax Fees	\$0.00
Total Provider Service Fees	\$0.00
Total Provider Tax Fees	\$0.00
Grand Total	\$8.23

Payment

Account Name	Visa
Transaction Amount	\$8.23
Transaction Response	Approved
Transaction ID	17085561
Order #	010587226-0

Request

Filing Type	EFileAndServe
Filing Code	Request

Filing Description	Request for Process
Reference Number	Flood Cases
Comments	
Status	Accepted
Accepted Date	05/12/2016 09:36:28 AM
Fees	
Court Fee	\$8.00
Service Fee	\$0.00

Optional Services	
>Issue Citation	\$8.00

Documents

<i>Lead Document</i>	request for processes_2016- LA.pdf	<u>[Original]</u> <u>[Transmitted]</u>
----------------------	---------------------------------------	--

eService Details

Name/Email	Firm	Service Type	Status Served	Date/Time Opened
Adam Nichols anichols@rmqlawfirm.com	Reaud Morgan & Quinn	EServe	Sent Yes	Not Opened

FILED: 4/20/2016 5:37:39 PM
Vickie Edgerly, District Clerk
Orange County, Texas
By: Denise Smith, Deputy

CAUSE NO. B160137-C

PERRY BONIN, ACE CHANDLER AND MICHAEL MANUEL, ET AL	§	IN THE DISTRICT COURT
	§	
VS.	§	ORANGE COUNTY, TEXAS
	§	
SABINE RIVER AUTHORITY OF TEXAS	§	
and SABINE RIVER AUTHORITY	§	
OF LOUISIANA	§	<u>163rd</u> JUDICIAL DISTRICT

PLAINTIFFS ORIGINAL PETITION

COMES NOW *Perry Bonin, Ace Chandler and Michael Manuel, et al*, whose names are more fully listed on Exhibits "A", "B" and "C" attached hereto and hereinafter referred to as "Plaintiffs", and files this their Original Petition complaining of Defendants, Sabine River Authority of Texas and Sabine River Authority of Louisiana, and for cause of action would respectfully show unto the Court as follows:

I. INTRODUCTION

The Texas Constitution's protection of rights and liberties include the command that "No person's property shall be taken, damaged or destroyed for or applied to public use without adequate compensation being made." Tex.Const. Art. I, Section 17(a). Similarly, the Louisiana Constitution provides that "Property shall not be taken or damaged by the state or its political subdivisions except for public purposes and with just compensation paid to the owner or into court for his benefit." Louisiana Const. Art. I, Section 4(B).

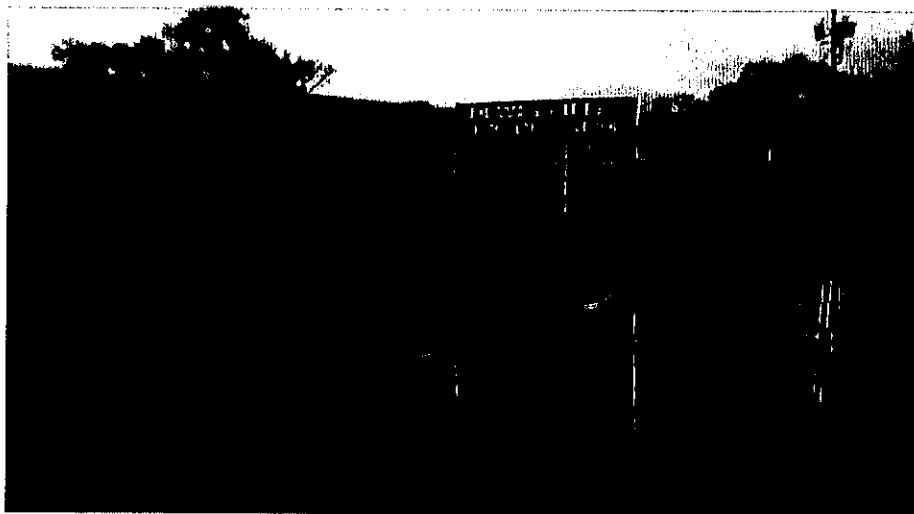
Beginning on or about March 9, 2016, the Sabine River Authorities of Texas and Louisiana, each a governmental entity acting in the exercise of the powers granted it by the respective States caused there to be a deliberate release of water from the Toledo Bend

spillway gates into the Sabine River. During the next 24 hours, nine spillway gates had been opened to a measure of twenty-two feet each. It is estimated that at the peak, the amount of water being deliberately released into the Sabine River was over 200,000 cubic feet per second. As a point of comparison, Niagara Falls is said to average approximately 85,000 cubic feet per second of discharge.

By opening the spillway gates in this manner, the Defendants knew, or were substantially certain, that harm would result to the many thousands of homeowners, business owners, churches, and others who owned property downstream. Indeed, the Defendants and others quickly released predictions of the flood levels which would result from this enormous discharge.

The predictions turned out to be a tragic reality for many thousands of Texas residents. The community of Deweyville was perhaps hardest-hit, as shown by the photographs below:





And yet the damage and devastation continued, along with the water, down the Sabine. The City of Orange, Texas also experienced extensive flooding, as shown by the photograph below:



Further damage on the Louisiana side of the Sabine River is shown in the photographs below:



All along the Sabine River and nearby areas, homes and businesses and churches were flooded, property was destroyed, burial vaults were disinterred and scattered, and animals and livestock were killed, in the name of and by the authority of the Defendants, each a governmental entity deliberately acting in the exercise of the powers granted it by

its respective State. Plaintiffs herein assert their constitutional right to be adequately compensated for their property which was taken or damaged for public use.

II. PARTIES

Plaintiffs listed in Exhibits "A", "B" and "C" attached hereto would show that they are resident-citizens of the States of Texas and Louisiana. Plaintiffs bring this case pursuant to Level 3 of the Revised Texas Rules of Civil Procedure. Plaintiffs allege that their damages, individually, are within the jurisdictional limits of this court and further allege, pursuant to Rule 47 of the Texas Rules of Civil Procedure, are collectively for monetary relief over \$1,000,000; and individually are either for monetary relief of \$100,000 or less; or over \$100,000 but not more than \$200,000; or over \$200,000 but not more than \$1,000,000.

Venue is proper in Orange County, Texas, as it is the County in which the principal offices of Defendant Sabine River Authority of Texas is found, and as it is a County in which a substantial part of the acts and events giving rise to this action took place.

Defendant, **SABINE RIVER AUTHORITY OF TEXAS**, is a governmental agency with a general office in Orange, Orange County, Texas and may be served with process at 12777 N. Highway 87, Orange, Texas 77632.

Defendant, **SABINE RIVER AUTHORITY OF LOUISIANA**, is a governmental agency and may be served with process through the Secretary of State for the State of Louisiana by serving them through their Legal Services Section, 8585 Archives Ave., Baton Rouge, LA 70809.

**III. CLAIMS BY OWNERS OF PROPERTY IN TEXAS ARISING OUT OF THE
TAKING OF PROPERTY IN THE STATE OF TEXAS BY SABINE RIVER
AUTHORITY OF TEXAS AGAINST SABINE RIVER AUTHORITY OF TEXAS**

In March 2016, as a result of the actions set forth above, the property of the Plaintiffs listed in Exhibit "A" hereto was taken, damaged, or destroyed. The Plaintiffs in Exhibit "A" are residents of the State of Texas.

As such, Plaintiffs invoke the protections of Article I of the Texas Constitution and pray for adequate compensation for such taking, damaging, and destruction of property.

**IV. CLAIMS BY OWNERS OF PROPERTY IN LOUISIANA
ARISING OUT OF THE TAKING OF PROPERTY IN THE STATE
OF LOUISIANA BY SABINE RIVER AUTHORITY OF TEXAS
AGAINST SABINE RIVER AUTHORITY OF LOUISIANA**

In March 2016, as a result of the actions set forth above, the property of the Plaintiffs listed in Exhibits "B" and "C" hereto was taken or damaged. The Plaintiffs in Exhibit "B" are residents of the State of Louisiana; the Plaintiffs in Exhibit "C" are residents of the State of Texas.

As such, Plaintiffs invoke the protections of Article I of the Louisiana Constitution and pray for adequate compensation for such taking, damaging, and destruction of property.

V. REQUEST FOR DISCLOSURE

Plaintiffs request that Defendants supply all information required by TEX.R.CIV.P.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiffs prays that the Defendants be cited to answer and appear and that upon final hearing, the Plaintiffs recover the following:

1. Compensation, in the form of money damages, for all property taken, damaged, or destroyed, pursuant to their rights under the appropriate State Constitution;
2. Pre-judgment interest, post-judgment interest, and costs of court to the fullest extent allowable by law; and
3. Such other and further relief, at law or in equity, as to which Plaintiffs are justly entitled.

Respectfully submitted,

REAUD, MORGAN & QUINN, L.L.P.
801 Laurel Street
P. O. Box 26005
Beaumont, Texas 77720-6005
(409) 838-1000
Fax (409) 833-8236

By /s/ Glen W. Morgan
Glen W. Morgan
State Bar No. 14438900
gmorgan@rmqlawfirm.com
Adam Nichols
State Bar No. 24046531
anichols@rmqlawfirm.com
John Werner
State Bar No. 00787920
jwerner@rmqlawfirm.com

Attorneys for Plaintiffs

PLAINTIFFS RESPECTFULLY DEMAND A TRIAL BY JURY

EXHIBIT "A"

CLIENTS NAME	CLIENTS ADDRESS	CITY	STA	ZIP
Albert & Mary Collins	1247 Palm Drive	Orange	TX	77630
Alice Calloway & William Chancery	1764 CR 4213	Orange	TX	77632
Allan Pierce & Tiffanie Powell	154 P.R. 8035	Kirbyville	TX	75956
Anita Mitchell Ryan	5454 Mitchell Road	Orange	TX	77630
Anita Mitchell Ryan	282 PR 8072	Call	TX	75933
Becky Harris	281 CR 4146	Deweyville	TX	77632
Betty A. Goddard	299 CR 4146	Deweyville	TX	77614
Bridget Coleman Edwards	1705 8th Street	Orange	TX	77630
Bufford Larry Berry	401 CR 4128	Deweyville	TX	77614
Chad & Amber Williams	243 CR 4166	Deweyville	TX	77614
Chad Kennedy Bailey	263 CR 4206	Orange	TX	77632
Charles & Candie Broussard	152 PVT RD 8055	Call	TX	75933
Charles Wesley Laughlin	625 Hwy. 12	Deweyville	TX	77614
Clarence Keith Curl, Jr.	244 CR 4146	Deweyville	TX	77614
Crystal R. Haymon	117 CR 4199 B	Orange	TX	77632
Cynthia Marie Myers	Spur 272	Deweyville	TX	77614
Cynthia Marie Myers	2623 Hwy. 12 East	Deweyville	TX	77614
Dakota Dickman	117 CR 4199 C	Orange	TX	77632
Daniel Martin Keogh	136 CR 4146	Deweyville	TX	77632
Danna M. Therrien	1870 CR 4110	Call	TX	75933
Darrell Wayne Woodard	#308 CR 4128	Deweyville	TX	77614
David & Laurie Rogers	2428 CR 4095	Bonwier	TX	75928
David & Vera Gillis	513 CR 4129	Orange	TX	77632
David Watson Brice, Jr.	360 P.R. 8059	Call	TX	75933
Dennis Bussell	534 CR 4205	Orange	TX	77632
Donald & Loretta Vanderbilt	1443 CR 4191	Orange	TX	77632
Dorothy Dedon Hryhorchuk	4156 CR 260	Deweyville	TX	77614
Emily Martin	11483 East State Hwy. 190	Bon Wier	TX	75928
Frank Folks, Jr. & Amanda Folks	196 CR 4223	Orange	TX	77632
Frank H. & Peggy A. Cloud	212 PVT 8160 Hwy. 12	Orange	TX	77632
Fred & Debra Johnson	282 CR 4138	Orange	TX	77632
Fred E. Ashworth	2892 CR 4191	Orange	TX	77632
Gary & Bridgette Moore	1804 N. 18th Street	Nederland	TX	77627
Gloria Jenette Stafford	273 CR 4179 Hwy. 12	Deweyville	TX	77614
Gloria M. Paris	609 Cordrey Ave	Orange	TX	77630
Henry Stanley	42743 Hwy. 87	Orange	TX	77632
Howard & Linda Duvall	402 CR 4078	Bonwier	TX	7592-3000
James & Mary Dubose	920 CR 4078	Bon Wier	TX	75928
James E. Wilson	4142 CR	Deweyville	TX	77614
James Edward Brown	219 PVT Rd. 8078	Buna	TX	77612
James L. Vincent	3106 West Bluff Road	Orange	TX	77632
Janice K. Bingle	130 PR 8073	Call	TX	75933
Jason & Stacey Verrett	110 Private Road 8955 #9	Orange	TX	77632
Jerome D. Norton	CR 2076	Newton	TX	
Jerry L. Vincent II	3054 FM 3247	Orange	TX	77632
Jimmie N. Williamson	251 Cr 4216	Orange	TX	77632

EXHIBIT "A"

CLIENTS NAME	CLIENTS ADDRESS	CITY	STA	ZIP
Jimmy Ray Burnitt	4773 West Bluff Road	Orange	TX	77632
John & Elaine Hanner	363 CR 4212	Orange	TX	77632
Johnnie D. Levi	609 Cordrey Ave	Orange	TX	77630
Jon D. Johnson	P.O. Box 929	Deweyville	TX	77614
Joseph & Theresa Bloodworth	PR 153	Deweyville	TX	77632
Judy & Cheryl Thompson	1421 CR 4191	Orange	TX	77632
Karen Arlene Smith	535 CR 4125	Orange	TX	77632
Karen Lisa Felder	1096 CR 4115	Buna	TX	77612
Karey & Angela Broussard	341 CR 4165	Deweyville	TX	77614
Katherine Thrailkille	4153 West Bluff Road	Orange	TX	77632
Kenneth Willis	181 PR 8104	Orange	TX	77632
Lanny E. Gibson	121 CR 4144	Deweyville	TX	77614
Larry Lavon Moore	2597 Hwy. 12	Orange	TX	77632
Lavan Spence	2613 CR 4122	Buna	TX	77612
Lena Lyons Rich	540 CR 2079	Burkeville	TX	75932
Linda George	2406 3rd Street	Orange	TX	77630
Lisa Dulaney POA for Harry C. Sport	1281 PVT RD 8249	Call	TX	75933
Lois Shoemake	P.O. Box 430	Deweyville	TX	77614
Louie David Garlington	Co Rd.	Burkeville	TX	75932
Louis Clifton Jolet	1316 CR 4085	Bonwier	TX	75928
Marc Edmiston & Kelly Pargas	526 CR 4110	Call	TX	75933
Mary McKean	2441 State Hwy. 12 E.	Deweyville	TX	77614
Melanie Green Wray	280 CR 7111	Call	TX	75933
Michelle Johnson	217 CR 4149	Orange	TX	77632
Montreall Easter	97 E. Oregon Street	Orange	TX	77630
Nancy Denise Brown	2288 CR 4191	Orange	TX	77632
Nicky & Jean Ward	214 Private Road 8074	Call	TX	75933
Odis & Diana Hoosier	557 Daffodil	Vidor	TX	77662
Orvel & Jadene VanWinkle	501 CR 4129	Orange	TX	77632
Oscar & Carey Peet	3264 W. Bluff	Orange	TX	77632
Oscar Leblanc	1801 Lincoln Drive	Orange	TX	77630
Patricia Frazier	823 CR 4181	Orange	TX	77632
Patrick & Brenda Letulle	2077 CR 2076	Burkville	TX	75932
Patrick & Melissa Bickham	175 CR 4201	Orange	TX	77632
Patsy Hudson	111 CR 4171	Deweyville	TX	77614
Patsy Tynes	CR 4149 House # 204	Deweyville	TX	77632
Perry Bonin	194 CR 4148	Deweyville	TX	77614
Perry Jacob Bonin	194 County Rd 4148	Deweyville	TX	77614
Raul Diaz, Jr.	2320 3rd Street	Orange	TX	77630
Robert & Marilyn Ballast	895 CR 4076	Bonwier	TX	75928
Robert Bickham	162 CR 4156	Deweyville	TX	77632
Rodney P. Clark, Sr. & Anna Clark	2923 Kathleen Street	Orange	TX	77630
Rodney Whitfield	134 Private Road 8190	Orange	TX	77632
Rodrick Lafleur	3905 Peettree Road	Orange	TX	77632
Ronald & Telisa Norwood	111 E. Tennessee Street	Orange	TX	77630
Ross & Patricia Stirling	7202 Hwy. 965	Jasper	TX	75951

EXHIBIT "A"

CLIENTS NAME	CLIENTS ADDRESS	CITY	STA	ZIP
Ruby Foreman Arnold	790 CR 4156	Deweyville	TX	77614
Salvador Torres, Jr.	811 CR 4191	Orange	TX	77614
Shannon Ratcliff	673 CR 823	Buna	TX	77612
Shannon Ratcliff	2141 CR 4122	Buna	TX	77612
Sharon Shepherd	209 PVT 8103	Deweyville	TX	77614
Shirley Franklin Horton	335 CR 4960	Deweyville	TX	77614
Stephen Keith Lisle	145 CR 4960	Orange	TX	77632
Stephen Keith Lisle	213 CR 4960	Orange	TX	77630
Sue Hollyfield	554 CR 4129	Deweyville	TX	77614
Tabor Ebner	198 CR 4161	Deweyville	TX	77614
Taboris Edgric Joyce	272 CR 2003	Bonwier	TX	75928
Thomas J. Hardin	109 CR 4212	Orange	TX	77632
Thomas Wilkerson, Sr. & Bobbie Wilkerson	553 Hwy. 12 E.	Deweyville	TX	77614
Torrance Ramone Cameron	2112 6th Street	Orange	TX	77630
Troy & Emily Letulle	CR 2080	Burkeville	TX	75932
Twala S. Dubose	493 CR 4078	Bon Wier	TX	75928
Valerie Jones	5911 Armitage Drive	Orange	TX	77632
Wanda Lambright	4161 Daisey Road	Deweyville	TX	77614
Wilbur Eugene Hryhorchuk	2509 CR 4235	Deweyville	TX	77614
William & Mary Green	505 Pvt Road	Call	TX	75933
William Keith Cole	234 CR 4166	Deweyville	TX	77614
William Snyder, III & Gabriella Snyder	210 W. Green	Orange	TX	77630
William Snyder, III & Gabriella Snyder	200 Turret	Orange	TX	77630

EXHIBIT "B"

CLIENTS NAME	CLIENTS ADDRESS	CITY	STATE	ZIP
Ace Chandler	1842 Parish Loop	Vinton	LA	70668
Alvin Leleux, Sr. & Sandra Leleux	189 Scales Road	Starks	LA	70661
Alvin Meshell	5184 Fountain Cemetery Road	Starks	LA	70661
Angela East	163 Green Moore Road	Starks	LA	70661
Arthur Paige, Jr.	116 Hunter Road	Anacoco	LA	71403
Baerbel M. Boykin	1304 Robert Clark Road	Starks	LA	70633
Billy G. Gilpatrick	1441 Vanmeter Road	Vinton	LA	70668
Brenda Stelly	1488 Robert Clark	Starks	LA	70661
Brett McCaughey	3441 Niblets Bluff	Vinton	LA	70668
Brian Childress	1397 Robert Clark Road	Starks	LA	70661
Caleb Jase Hebert	5304 Gillis Road	Starks	LA	70661
Carl F. Barlow, Jr.	1303 East Street	Vinton	LA	70668
Carl F. Barlow, Jr.	136 Scales Road	Starks	LA	70661
Carolyn Maddox	181 Green Moore Road	Starks	LA	70661
Cassy Marks & Thomas Smith	4669 Arley Myers	Starks	LA	70661
Chester A. Courmier	3004 Spell Road	Vinton	LA	70668
Chris Stevison	5304 Gillis Road	Starks	LA	70661
Christina Langley	5304 Gillis Road	Starks	LA	70661
Clara Mae Jackson	5929 Cormier Cemetery Road	Vinton	LA	70668
Clifton Sims	2951 Spell Road	Vinton	LA	70668
Clinton Elmer Harrison III	1780 Arledge Road	Vinton	LA	70668
Crystal Hoffpaur & Sonny Smith	244 Green Moore Road	Starks	LA	70661
Dale & Mary Reed	2496 Old Hwy. 90	Vinton	LA	70668
Daniel Rhodes	1365 Mouth of the Creek Road	Merryville	LA	70653
Darren & Sandy Brown	1279 Old River Road	Starks	LA	70661
David & Amanda Doyle	5034 Jimmie Doyle Road	Starks	LA	70661
David Butts	6144 Stewart Road	Vinton	LA	70668
David Foster	3349 Green Island Road	Starks	LA	70661
Deborah Welch	183 Scales Road	Starks	LA	70661
Debra A. Pharris	1610 Robert Clark Road	Starks	LA	70661
Don E. Johnson	393 Green Moore Road	Starks	LA	70661
Donald Ray Wilkins	1576 Robert Clark Road	Starks	LA	70661
Donna Barber	1813 Alex Granger Road	Vinton	LA	70668
Donna Marie Duke	3225 Line Road	Vinton	LA	70668
Donna Tabor	1645 Arledge Road	Vinton	LA	70668
Doris P Herring	5195-I Fountain Cemetery Road	Starks	LA	70661
Edda Mobley	6058 Stewart Road	Vinton	LA	70668
Eldon Welch, Jr.	1360 Robert Clark Road	Starks	LA	70661
Elizabeth N. Bradshaw	1165 Green Moore Road	Starks	LA	70661
Elton & Barbara Barks	1720 Mcadio Lark Lane	Vinton	LA	70668
Elton & Barbara Barks	1094 Robert Clark Road	Vinton	LA	70661
Emily Miranda Thompson	1283 Old River Road	Starks	LA	70661
Eulice Benoit, Jr.	6090 Stewart Road	Vinton	LA	70668
Shelby D. Beassie	6090 Stewart Road	Vinton	LA	70668
Gary Dean Gray	537 Toro Road	Florien	LA	71429
George & Patricia Phillips	1244 Old River Road	Starks	LA	70661

EXHIBIT "B"

CLIENTS NAME	CLIENTS ADDRESS	CITY	STA	ZIP
George L. Sealy	6023 Cormier Cemetary Road	Vinton	LA	70668
George R. Dias	691 Claude Stanley	Starks	LA	70661
George W. Burch	1826 Broomes Road	Vinton	LA	70668
Harry & Barbara Leger	301 River Camp Road	Evans	LA	70639
James & Judy Reeves	223 Scales Road	Starks	LA	70661
James Drummond	1169 & 1175 Robert Clark Road	Starks	LA	70661
James E. Brown	203 Scales Road	Starks	LA	70661
James Trent Vincent	534 Bass Lake Road	Starks	LA	70661
Jason & Barbara Royer	311 Roy Thompson Road	Merryville	LA	70653
Jeanie Clark	4891 McMahan Loop	Starks	LA	70661
Jimmy A. Young	1742 Snyder Road	Merryville	LA	70653
Jimmy Stewart	115 Green Moore Road	Starks	LA	70661
Joanna Shull	1765 Arledge Road	Vinton	LA	70668
John & Melissa Lucius	1548 Robert Clark Road	Starks	LA	70633
Johnny F. Henry	619 Old River Road	Starks	LA	70661
Johnny Toney, Jr. & Laura Toney	1685 Arledge Road	Vinton	LA	70668
Judith Monceaux	1921 Center Street	Vinton	LA	70668
Judy Doyle	4448 Hwy. 12	Starks	LA	70661
Justin & Brandy Hanson	1085 Van Meter Road	Vinton	LA	70668
Kathy Griffin	1304 Robert Clark	Starks	LA	70633
Keith & Carolyn Foster	5118 Luster Foster Road	Starks	LA	70661
Keith Pickering	1129 Doyle Road	DeQuincy	LA	70633
Keithon & Sherry Perkins	802 Pugh Street	DeQuincy	LA	70633
Kelly & Robin Bickham	1671 Arledge Road	Vinton	LA	70668
Kenneth & Conadita Cormier	1743 Meadow Park	Vinton	LA	70668
Kenneth Ashworth & Lisa Doucet	180 Scales Road	Starks	LA	70661
Kieth R. Robinson	1651 Wright Road	Vinton	LA	70668
Krystal Herline	3175 Niblett's Bluff Road	Vinton	LA	70668
Laura Woods	4867 Lou Farley Road	Starks	LA	70661
Linda B. Keeling	1808 Holden Granger Road	Vinton	LA	70668
Linda Martinez	1005 Old River Road	Starks	LA	70661
Linda Toups	Lot #1 Stewart Road	Vinton	LA	70668
Louis & Ladonna Gibson	4848 McMahan Loop	Starks	LA	70661
Marcus D. Gautreaux	3030 Niblett's Bluff Road	Vinton	LA	70668
Mark & Karen Crenshaw	4832 McMahan Loop	Starks	LA	70661
Mark & Karen Crenshaw	1318 Robert Clark Road	Starks	LA	70661
Marlene Palis Chaisson	6054 Stewart Road	Vinton	LA	70668
Mary Soileau	538 Bass Lake Road	Starks	LA	70661
Michael & Mildred White	4784 Ray Hitt Road	Starks	LA	70661
Michael Johnson	1840 Holden Granger	Vinton	LA	70668
Michael Quinton	6076 Patricia Lane	Vinton	LA	70668
Michael S. Fuselier	1460 Julie Drive	Sulphur	LA	70663
Michelle Weber	5093 Gibson Loop	Starks	LA	70661
Minnie & Willard White	4954 Pete Nation	Starks	LA	70661
Nina Denise Dyson	566 Humble Road	Merryville	LA	70657
Norma Huval Granger	3306 Niblett's Bluff	Vinton	LA	70668

EXHIBIT "B"

CLIENTS NAME	CLIENTS ADDRESS	CITY	STATE	ZIP
Penny Brohrer	1157 Robert Clark	Starks	LA	70661
Raymond & Lisa Richard	1748 B. Arledge	Vinton	LA	70668
Raymond Bussell	4755 Mazilly	Starks	LA	70661
Rene Hanks, Jr. & Lucy Hanks	193 Scales	Starks	LA	70661
Richard F. Robbins	177 Weaver	Leesville	LA	71446
Richard Westbrook	229 Scales Road	Starks	LA	70661
Ricky Ashworth	5232 Hwy. 12	Starks	LA	70661
Robert E. Tyler, Jr.	232 Shoupique Drive	Anacoco	LA	71403
Robert Strenkowski	191 Weaver Road	Leesville	LA	71446
Roger Douget	498 Bass Lake Road	Starks	LA	70661
Ronald & Erma Poole	231 Green Moore	Starks	LA	70661
Ronald & Mary Palmer	1585 Wright Road	Vinton	LA	70668
Ronald & Mary Palmer	Camp 1336 Robert Clark Road	Starks	LA	70661
Ronald Eugene Gillis	4931 Carol Johnson Road	Starks	LA	70661
Ronald Gillis	347 Old River Road	Starks	LA	70661
Ronnie L. Stevison	5304 Gillis Road House A	Starks	LA	70661
Roxanne L. Hiner	244 Scales	Starks	LA	70661
Samuel Romero	5060 Stewart Road	Vinton	LA	70668
Samuel Sparks	151 Scales Road	Starks	LA	70661
Selina Jones	Block 1 Lot 4 Stewart Road	Vinton	LA	70668
Shelia O. Guidry	3156 Niblets Bluff Road	Vinton	LA	70668
Sheralon Faye Reed	6116 Stewart Road	Sulphur	LA	70668
Sherry Doyle	592 Humble Road	Merryville	LA	70653
Sohpia Steitler	5304 Gillis Road House A	Starks	LA	70661
Susan Suire	3070 Niblets Bluff	Vinton	LA	70668
Tammy Granger	1275 Old River Road	Starks	LA	70661
Ted Ray Clark, Jr. & Sabrina Clark	5195 C Fountainn Cemetary Road	Starks	LA	70661
Terel & Judy Hines	Lot 35 of Indian Acres		LA	
Terry & Renee Bloodworth	174 Scales Road	Starks	LA	70661
Thor McCaughey	3189 Niblets Bluff	Vinton	LA	70668
Tina Courville	3277 Niblets Bluff Road	Vinton	LA	70668
Travis & Heather Hebert	1748 Arledge	Vinton	LA	70668
Vickie S. Hyatt	1264 Old River Road	Starks	LA	70661
Virgil Chester	1841 Holden Granger Road	Vinton	LA	70663
Wallace & Emma Veillon	1208 Old River Road	Starks	LA	70661
Waylon Stewart Gillis	4941 Carol Johnson Road	Starks	LA	70661
Wendell P. Ardoin	653 Doe Ridge Road	Anacoco	LA	71403
William & Jennifer Odom	4844 McMahon Loop	Starks	LA	70661
William & Jennifer Odom	4838 McMahon Loop	Starks	LA	70661
Willie C. Bradley	4860 Alligator Park Road	Starks	LA	70661
Yolande Smith	1067 Old River Road	Starks	LA	70661

EXHIBIT "C"

CLIENTS NAME	CLIENTS ADDRESS	CITY	STATE	ZIP
Michael Manuel	1756 Arledge Road	Vinton	LA	70668

FILED: 4/25/2016 1:18:40 PM
Vickie Edgerly, District Clerk



Crystal Thompson
Chief Deputy - Civil

Vickie Edgerly
Orange County District Clerk
801 W. Division Ave.
Orange, Texas 77630-6364
Phone: (409) 882-7825
Fax: (409) 882-7083



Anne Reed
Chief Deputy - Criminal

E-FILING REQUEST FOR PROCESS

All sections must be completed for processing this request

Section 1:

Cause No.: B-160,137-C

Date: 4/25/16

Style of Case: Perry Bonin, Ace Chandler, Michael Manuel, et al vs. Sabine River Authority of Texas and Sabine River Authority of Louisiana

Section 2:

Title of your Document / Name of Pleading to be attached for Service
Plaintiffs' Original Petition

Section 3:

Put the **NUMBER** of parties by the type of Service you're requesting below:

- 2 Citation (\$8.00 per party & per pleading)
 _____ Temporary Restraining Order (\$8.00 per party)
 _____ Notice of Hearing/Notice to Show Cause/Order to Appear (\$8.00 per party)
 _____ Application for Protective Order/Temporary (Ex Parte) Protective Order **
 Submit the **REQUIRED TCIC/NCIC Form and List below the Law Enforcement Agency to be served on:

- _____ Precept to Serve (\$8.00 per party)
 _____ Writ of _____ (8.00 per party)
 _____ Citation by Posting (\$8.00 per party)
 _____ Citation by Publication (\$8.00 per party)* Newspapers Name & Address: _____
 _____ Citation by Secretary of State (\$16.00 per party)
 _____ Citation by Texas Highway Commission (\$16.00 per party)
 _____ Civil Bond Approval (\$4.00)
 _____ Other _____

Section 4:

Put a ☒ by Type of Delivery below:

- ☒ By E-Mail (Please provide E-Mail address, Contact Name and Phone Number below)
dmarquardt@rmqlawfirm.com, Danyel Marquardt, (409) 838-1000
 _____ Process Server
 _____ Out of County
 _____ Orange Co. Sheriff (add \$75.00 per party & per piece of service)
 _____ Writ Served by Orange Co. Sheriff (add \$125.00 per party)
 _____ Certified Mail-Return Receipt Requested (add \$75.00 per party & per piece of service)
 _____ Protective Order
 _____ Warrant or Capias (Civil \$80.00)
 _____ Other: _____

** SERVICE NOT BEING RETURNED BY E-MAIL:

There will be a service copy charge of \$1.00 per page, per pleading & per party, Please list below the total amount of copies and cost you will be paying.

_____ **Copies for Service: Total Number of Pages, Per Party being served: _____ \$ _____

Section 5:

Parties to Be Served: (Please Type or Print)

1. **Name:** Sabine River Authority of Texas

Address: 12777 N. Highway 87

City: Orange State: TX Zip: 77630

Type of Service requested: none

2. **Name:** Sabine River Authority of Louisiana through the Louisiana Secretary of State

Address: Legal Services Section, 8585 Archives Ave.

City: Baton Rouge State: LA Zip: 70809

Type of Service requested: none

3. **Name:** _____

Address: _____

City: _____ State: _____ Zip: _____

Type of Service requested: _____

4. **Name:** _____

Address: _____

City: _____ State: _____ Zip: _____

Type of Service requested: _____

5. **Name:** _____

Address: _____

City: _____ State: _____ Zip: _____

Type of Service requested: _____

6. **Name:** _____

Address: _____

City: _____ State: _____ Zip: _____

Type of Service requested: _____

Section 6:

Attorney's Name: John Werner

Address: 801 Laurel St.

City: Beaumont State: TX Zip: 77701

Attorney's Telephone No.: (409) 838-1000 Attorney's Bar No.: 00787920

Attorney's E-Mail Address: jwerner@rmqlawfirm.com



Crystal Thompson
Chief Deputy - Civil

Vickie Edgerly
Orange County District Clerk
801 W. Division Ave.
Orange, Texas 77630-6364
Phone: (409) 882-7825
Fax: (409) 882-7083

FILED: 5/11/2016 5:42:00 PM
Vickie Edgerly, District Clerk
Orange County, Texas
By: Denise Smith, Deputy

Anne Reed
Chief Deputy - Criminal

E-FILING REQUEST FOR PROCESS

All sections **must** be completed for processing this request

Section 1:

Cause No.: B-160,137-C

Date: 5/11/16

Style of Case: Perry Bonin, Ace Chandler, Michael Manuel, et al vs. Sabine River Authority of Texas and Sabine River Authority of Louisiana

Section 2:

Title of your Document / Name of Pleading to be attached for Service
Plaintiffs' Original Petition

Section 3:

Put the **NUMBER** of parties by the type of Service you're requesting below:

- 1 Citation (\$8.00 per party & per pleading)
 _____ Temporary Restraining Order (\$8.00 per party)
 _____ Notice of Hearing/Notice to Show Cause/Order to Appear (\$8.00 per party)
 _____ Application for Protective Order/Temporary (Ex Parte) Protective Order **
 Submit the **REQUIRED TCIC/NCIC Form and List below the Law Enforcement Agency to be served on:

- _____ Precept to Serve (\$8.00 per party)
 _____ Writ of _____ (8.00 per party)
 _____ Citation by Posting (\$8.00 per party)
 _____ Citation by Publication (\$8.00 per party)* Newspapers Name & Address: _____
 _____ Citation by Secretary of State (\$16.00 per party)
 _____ Citation by Texas Highway Commission (\$16.00 per party)
 _____ Civil Bond Approval (\$4.00)
 _____ Other _____

Section 4:

Put a ☒ by Type of Delivery below:

☒ By E-Mail (Please provide E-Mail address, Contact Name and Phone Number below)
dmarquardt@rmqlawfirm.com, Danyel Marquardt, (409) 838-1000

- _____ Process Server
 _____ Out of County
 _____ Orange Co. Sheriff (add \$75.00 per party & per piece of service)
 _____ Writ Served by Orange Co. Sheriff (add \$125.00 per party)
 _____ Certified Mail-Return Receipt Requested (add \$75.00 per party & per piece of service)
 _____ Protective Order
 _____ Warrant or Capias (Civil \$80.00)
 _____ Other: _____

** SERVICE NOT BEING RETURNED BY E-MAIL:

There will be a service copy charge of \$1.00 per page, per pleading & per party, Please list below the total amount of copies and cost you will be paying.

_____ **Copies for Service: Total Number of Pages, Per Party being served: _____, \$ _____

Section 5:

Parties to Be Served: (Please Type or Print)

1. Name: Sabine River Authority of Louisiana

Address: 15091 Texas Hwy

City: Many State: LA Zip: 71449

Type of Service requested: by serving it's director or officer

2. Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Type of Service requested: _____

3. Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Type of Service requested: _____

4. Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Type of Service requested: _____

5. Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Type of Service requested: _____

6. Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Type of Service requested: _____

Section 6:

Attorney's Name: Adam Nichols

Address: 801 Laurel St.

City: Beaumont State: TX Zip: 77701

Attorney's Telephone No.: (409) 838-1000 Attorney's Bar No.: 24046531

Attorney's E-Mail Address: anichols@rmqlawfirm.com

CAUSE NO. B160137-C

PERRY BONIN, ACE CHANDLER	§	IN THE DISTRICT COURT
AND MICHAEL MANUEL, ET AL	§	
	§	
VS.	§	ORANGE COUNTY, TEXAS
	§	
SABINE RIVER AUTHORITY OF TEXAS	§	
and SABINE RIVER AUTHORITY	§	
OF LOUISIANA	§	163 rd JUDICIAL DISTRICT

PLAINTIFFS FIRST AMENDED PETITION

COMES NOW *Perry Bonin, Ace Chandler and Michael Manuel, et al*, whose names are more fully listed on Exhibits “A”, “B”, “C”, “D” and “E” attached hereto and hereinafter referred to as “Plaintiffs”, and files this their First Amended Petition complaining of Defendants, Sabine River Authority of Texas and Sabine River Authority of Louisiana, and for cause of action would respectfully show unto the Court as follows:

I. INTRODUCTION

The Texas Constitution’s protection of rights and liberties include the command that “No person’s property shall be taken, damaged or destroyed for or applied to public use without adequate compensation being made.” Tex.Const. Art. I, Section 17(a). Similarly, the Louisiana Constitution provides that “Property shall not be taken or damaged by the state or its political subdivisions except for public purposes and with just compensation paid to the owner or into court for his benefit.” Louisiana Const. Art. I, Section 4(B).

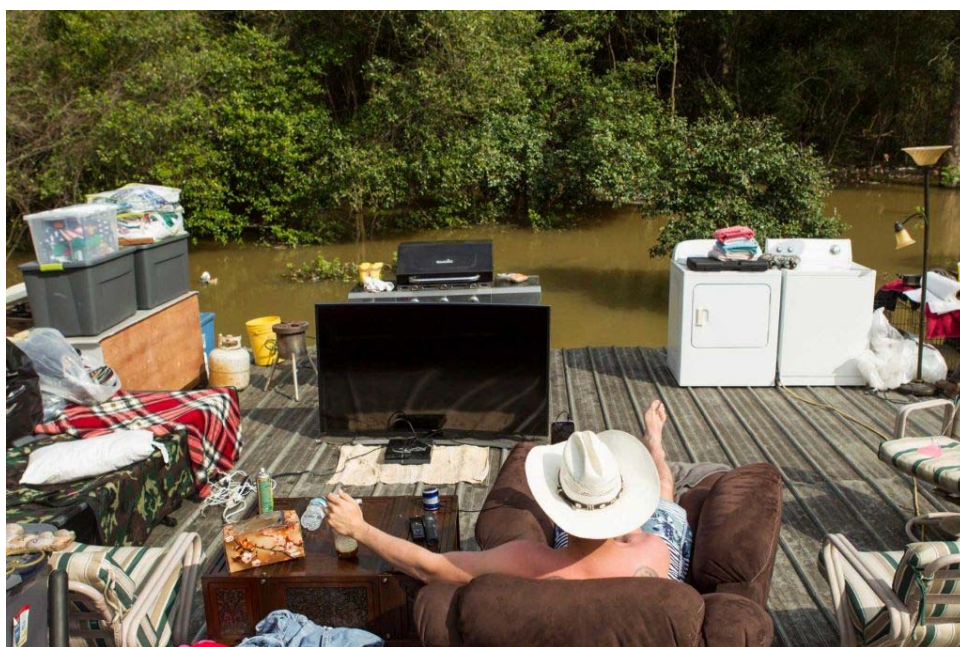
Beginning on or about March 9, 2016, the Sabine River Authorities of Texas and Louisiana, each a governmental entity acting in the exercise of the powers granted it by the respective States caused there to be a deliberate release of water from the Toledo Bend spillway gates into the Sabine River. During the next 24 hours, nine spillway gates had

been opened to a measure of twenty-two feet each. It is estimated that at the peak, the amount of water being deliberately released into the Sabine River was over 200,000 cubic feet per second. As a point of comparison, Niagara Falls is said to average approximately 85,000 cubic feet per second of discharge.

By opening the spillway gates in this manner, the Defendants knew, or were substantially certain, that harm would result to the many thousands of homeowners, business owners, churches, and others who owned property downstream. Indeed, the Defendants and others quickly released predictions of the flood levels which would result from this enormous discharge.

The predictions turned out to be a tragic reality for many thousands of Texas residents. The community of Deweyville was perhaps hardest-hit, as shown by the photographs below:





And yet the damage and devastation continued, along with the water, down the Sabine. The City of Orange, Texas also experienced extensive flooding, as shown by the photograph below:



Further damage on the Louisiana side of the Sabine River is shown in the photographs below:



All along the Sabine River and nearby areas, homes and businesses and churches were flooded, property was destroyed, burial vaults were disinterred and scattered, and animals and livestock were killed, in the name of and by the authority of the Defendants, each a governmental entity deliberately acting in the exercise of the powers granted it by

its respective State. Plaintiffs herein assert their constitutional right to be adequately compensated for their property which was taken or damaged for public use.

II. PARTIES

The Plaintiffs in Exhibit “A” attached hereto would show that they are resident-citizens of the State of Texas and own property in the State of Texas. The Plaintiffs in Exhibit “B” attached hereto would show that they are resident-citizens of the State of Louisiana and own property in the State of Louisiana. Plaintiff’s in Exhibit “C” attached hereto would show that they are resident-citizens of the State of Texas and own property in the State of Louisiana. Plaintiffs in Exhibit “D” attached hereto would show that they are resident-citizens of the State of Louisiana and own property in the State of Texas. Plaintiffs in Exhibit “E” attached hereto would show that they are resident-citizens of other states and own property in the State of Texas.

Plaintiffs bring this case pursuant to Level 3 of the Revised Texas Rules of Civil Procedure. Plaintiffs allege that their damages, individually, are within the jurisdictional limits of this court and further allege, pursuant to Rule 47 of the Texas Rules of Civil Procedure, are collectively for monetary relief over \$1,000,000; and individually are either for monetary relief of \$100,000 or less; or over \$100,000 but not more than \$200,000; or over \$200,000 but not more than \$1,000,000.

Venue is proper in Orange County, Texas, as it is the County in which the principal offices of Defendant Sabine River Authority of Texas is found, and as it is a County in which a substantial part of the acts and events giving rise to this action took place.

Defendant, **SABINE RIVER AUTHORITY OF TEXAS**, is a governmental agency with a general office in Orange, Orange County, Texas and may be served with process at 12777 N. Highway 87, Orange, Texas 77632. **Defendant has been served with process and is properly before the Court.**

Defendant, **SABINE RIVER AUTHORITY OF LOUISIANA**, is a governmental agency and may be served with process through the Secretary of State for the State of Louisiana by serving them through their Legal Services Section, 8585 Archives Ave., Baton Rouge, LA 70809. **Defendant has been served with process but has not appeared.**

**III. CLAIMS BY OWNERS OF PROPERTY IN TEXAS ARISING OUT OF THE
TAKING OF PROPERTY IN THE STATE OF TEXAS BY SABINE RIVER
AUTHORITY OF TEXAS AGAINST SABINE RIVER AUTHORITY OF TEXAS**

In March 2016, as a result of the actions set forth above, the property of the Plaintiffs listed in Exhibit “A”, “D” and “E” hereto was taken, damaged, or destroyed. The Plaintiffs in Exhibit “A” are residents of the State of Texas and own property in the State of Texas. Plaintiffs in Exhibit “D” are residents of the State of Louisiana and own property in the State of Texas. Plaintiffs in Exhibit “E” are residents of other states and own property in the State of Texas.

As such, Plaintiffs invoke the protections of Article I of the Texas Constitution and pray for adequate compensation for such taking, damaging, and destruction of property.

**IV. CLAIMS BY OWNERS OF PROPERTY IN LOUISIANA
ARISING OUT OF THE TAKING OF PROPERTY IN THE STATE
OF LOUISIANA BY SABINE RIVER AUTHORITY OF TEXAS
AGAINST SABINE RIVER AUTHORITY OF LOUISIANA**

In March 2016, as a result of the actions set forth above, the property of the Plaintiffs listed in Exhibits “B” and “C” hereto was taken or damaged. The Plaintiffs in Exhibit “B” are residents of the State of Louisiana and own property in the State of Louisiana; the Plaintiffs in Exhibit “C” are residents of the State of Texas and own property in the State of Louisiana.

As such, Plaintiffs invoke the protections of Article I of the Louisiana Constitution and pray for adequate compensation for such taking, damaging, and destruction of property.

V. REQUEST FOR DISCLOSURE

Plaintiffs request that Defendants supply all information required by TEX.R.CIV.P. 194.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiffs prays that the Defendants be cited to answer and appear and that upon final hearing, the Plaintiffs recover the following:

1. Compensation, in the form of money damages, for all property taken, damaged, or destroyed, pursuant to their rights under the appropriate State Constitution;
2. Pre-judgment interest, post-judgment interest, and costs of court to the fullest extent allowable by law; and
3. Such other and further relief, at law or in equity, as to which Plaintiffs are justly entitled.

Respectfully submitted,

REAUD, MORGAN & QUINN, L.L.P.

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Beaumont, Texas 77720-6005

(409) 838-1000

Fax (409) 833-8236

By /s/ Glen D. Morgan

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John Werner

State Bar No. 00787920

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Attorneys for Plaintiffs

PLAINTIFFS RESPECTFULLY DEMAND A TRIAL BY JURY

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument has been served on all appropriate parties this 25th day of May, 2016.

Lawrence L. Germer
Charles W. Goehringer, Jr.
Germer PLLC
P O Box 4915
Beaumont, Texas 77704-4915
(409) 654-6700 (telephone)
(409) 835-2115 (facsimile)
Attorneys for Defendant,
Sabine River Authority of Texas

/s/ Glen D. Morgan

Glen W. Morgan

EXHIBIT A

	A	B	C	D	E
1	Name	Primary Address Street	Primary Address City	Primary Address State	Primary Address Postal Code
2	Albert & Mary Collins	1247 Palm Drive	Orange	TX	77630
3	Alice Calloway & William Chancery	1764 CR 4213	Orange	TX	77632
4	Allan Pierce & Tiffanie Powell	154 P.R. 8035	Kirbyville	TX	75956
5	Allen & Brenda Monson	517 CR 843	Buna	TX	77612
6	Allen & Gwen Tolbert	CR 4146 #294	Deweyville	TX	77614
7	Alonia & Arthur Samuel	12765 FM 1416	Bon Wier	TX	75928
8	Alton R. Jones	168 CR 4192	Orange	TX	77632
9	Ambika Seastrunk	195 CR 4085	Bon Wier	TX	75928
10	Angela Ball	558 CR 4154	Orange	TX	77632
11	Angelene Brown	1235 CR 2133	Burkeville	TX	75932
12	Angeliea & Eric Williams	2212 CR 4191	Orange	TX	77632
13	Anita Battles	1216 4th Street	Orange	TX	77630
14	Anita Michell Ryan	5454 Michell Road	Orange	TX	77630
15	Anita Michell Ryan	282 PR 8072	Call	TX	75933
16	Ann Smith	2607 CR 4122	Buna	TX	77612
17	Anna Lisenby	8066 Hwy. 63 E.	Burkeville	TX	75932
18	Annie Vosti	10264 Hwy. 190 E.	Bon Wier	TX	75928
19	Aquarius Daniels	207 N. Farragut	Orange	TX	77630
20	Barbara Callahan	306 PVT 8113	Orange	TX	77632
21	Barry Bates	1695 West Bluff Road	Orange	TX	77632
22	Becky Harris	281 CR 4146	Deweyville	TX	77632
23	Belinda Lemen	2172 CR 4213	Orange	TX	77632
24	Benny Hobden	#193 CR 4185	Orange	TX	77612
25	Berna Shelby & Ruby Gosey	8611 FM 1416	Bon Wier	TX	75928
26	Bessie Jordan	106 Bellina Street	Jasper	TX	75951
27	Betty A. Goddard	299 CR 4146	Deweyville	TX	77614
28	Bill Martinez	PVT 8101 Old Hwy. 87	Deweyville	TX	77614
29	Billy Sanders	415 CR 4101	Call	TX	75933
30	Bobby & Frances Cloud	206 OR 8102 CR 4191	Orange	TX	77632
31	Bobby Duncan	1761 CR 4212	Orange	TX	77632
32	Bonita Gosey	159 PR 8049	Bon Wier	TX	75928
33	Brandi Zirlott	185 PR 8185	Orange	TX	77632
34	Bridget Coleman Edwards	1705 8th Street	Orange	TX	77630
35	Bridgette Moore & Melissa King	303 PR 8065	Call	TX	75933
36	Bryan & Holly Bussell	521 CR 4205	Orange	TX	77632
37	Bryan Burks, Sr.	1466 CR 4117	Buna	TX	77612
38	Bufford Larry Berry	401 CR 4128	Deweyville	TX	77614
39	Carl & Brenda Gantt	3444 CR 4205	Orange	TX	77632
40	Carla Sonnenberg	6008 Hazlewood	Orange	TX	77632
41	Carol Boyd	310 CR 4114	Call	TX	75933
42	Carolyn Fenton	2164 CR 4191	Orange	TX	77632
43	Carlton Zetar, Jr.	217 N. Farragut	Orange	TX	77630
44	Chad & Amber Williams	243 CR 4166	Deweyville	TX	77614
45	Chad Fenton	2166 CR 4191	Orange	TX	77632
46	Chad Kennedy Bailey	263 CR 4206	Orange	TX	77632
47	Charles & Candie Broussard	152 PVT RD 8055	Call	TX	75933

	A	B	C	D	E
48	Charles Buxton	812 CR 4139	Deweyville	TX	77614
49	Charles E. Smith	650 CR 4070	Bon Wier	TX	75928
50	Charles Strickland	871 CR 4205	Orange	TX	77632
51	Charles Wesley Laughlin	625 Hwy. 12	Deweyville	TX	77614
52	Christopher Jones	516 CR 4129	Deweyville	TX	77614
53	Clarence & Teressa Williams	2397 CR 4122	Buna	TX	77612
54	Clarence Keith Curl, Jr.	244 CR 4146	Deweyville	TX	77614
55	Crystal R. Haymon	117 CR 4199 B	Orange	TX	77632
56	Curtis R. Jackson	9333 FM 1416	Bon Wier	TX	75928
57	Danny Cutaia	1265 Hwy. 12 East	Deweyville	TX	77614
58	Cynthia Marie Myers	Spur 272	Deweyville	TX	77614
59	Dakota Dickman	117 CR 4199 C	Orange	TX	77632
60	Dale Wayne Bland	4166 West Bluff Road	Orange	TX	77632
61	Daniel Ayres	811 Co. Rd. 2076	Newton	TX	75966
62	Daniel Burks	2326 CR 4117	Buna	TX	77612
63	Daniel Martin Keogh	136 CR 4146	Deweyville	TX	77632
64	Daniel Scott	1025 CR 2133	Burkeville	TX	75932
65	Danna M. Therrien	1870 CR 4110	Call	TX	75933
66	Danney & Shelley Borel	4276 West Bluff	Orange	TX	77632
67	Danny & Martha Monson	5273 CR 715	Buna	TX	77612
68	Danny Hajek	195 CR 4155	Deweyville	TX	77614
69	Darrel & Darlene Lou Woodard	2349 CR 4122	Buna	TX	77612
70	Darrell Wayne Woodard	#308 CR 4128	Deweyville	TX	77614
71	David & Laurie Rogers	2428 CR 4095	Bonwier	TX	75928
72	David & Vera Gillis	513 CR 4129	Orange	TX	77632
73	David Watson Brice, Jr.	360 P.R. 8059	Call	TX	75933
74	Debbie & Robert Walmsley	486 CR 2120	Burkeville	TX	75932
75	Delaina Hoosier	2408 W. 3rd	Orange	TX	77630
76	Dennis Bussell	534 CR 4205	Orange	TX	77632
77	Dennis Thomas	552 CR 4089	Bon Wier	TX	75928
78	Diana Miller	157 CR 4161	Deweyville	TX	77614
79	Don & Cynthia McCollough	236 CR 4170	Deweyville	TX	77614
80	Donald & Loretta Vanderbilt	1443 CR 4191	Orange	TX	77632
81	Donald & Mona Manning	158 CR 4135	Deweyville	TX	77614
82	Donald Uppike & Cathy Tysko	147 CR 4155	Deweyville	TX	77614
83	Dorothy Dedon Hryhorchuk	4156 CR 260	Deweyville	TX	77614
84	Dwayne Behan	CR 4150 #263	Deweyville	TX	77614
85	Edward Fairchild	138 CR 4133	Deweyville	TX	77614
86	Edward Smith	513 College	Orange	TX	77630
87	Elouise Hurst	1180 CR 4203	Orange	TX	77632
88	Emery Collins	1587 CR 4235	Orange	TX	77632
89	Emily Martin	11483 East State Hwy. 190	Bon Wier	TX	75928
90	Evelyna Rhodes	2025 5th Street	Orange	TX	77630
91	Floyce Deana Sherrill	706 North	Orange	TX	77630
92	Frank Folks, Jr. & Amanda Folks	196 CR 4223	Orange	TX	77632
93	Frank H. & Peggy A. Cloud	212 PVT 8160 Hwy. 12	Orange	TX	77632
94	Fred & Debra Johnson	282 CR 4138	Orange	TX	77632
95	Fred E. Ashworth	2892 CR 4191	Orange	TX	77632
96	Freddie & Rhenda Edwards	CR 4146	Deweyville	TX	77614
97	Garry & Bridgette Moore	1699 CR 475	Bon Wier	TX	75928

	A	B	C	D	E
98	George & Loretta Sharp	292 CR 4205	Orange	TX	77632
99	George Beauchamp	405 Old Times	Orange	TX	77630
100	Glenda McCrimon	410 CR 4081	Bon Wier	TX	75928
101	Gloria Jenette Stafford	273 CR 4179 Hwy. 12	Deweyville	TX	77614
102	Gloria M. Paris	609 Cordrey Ave	Orange	TX	77630
103	Guy & Deborah Guillory	274 CR 4147	Deweyville	TX	77632
104	Hal Michael & Carolyn Perdue	2930 CR 2016	Newton	TX	75966
105	Hamp Lewis, Jr. & Judy Lewis	CR 4122	Buna	TX	77612
106	Harry Sells	9107 FM 1416	Bon Wier	TX	75928
107	Heath Prewitt	162 CR 4159	Orange	TX	77632
108	Henry Myers	784 CR 4089	Bon Wier	TX	75928
109	Henry Stanley	42743 Hwy. 87	Orange	TX	77632
110	Howard & Linda Duvall	402 CR 4078	Bonwier	TX	7592-3000
111	Hunter Thompson	520 Spur 272	Orange	TX	77614
112	India Rhodes	305 CR 4083	Bon Wier	TX	75928
113	Jacqueline LeFleur	101 CR 4206	Orange	TX	77632
114	James & Belinda Hooks	327 CR 4107	Call	TX	75933
115	James & Carrie Holden	208 CR 4129	Deweyville	TX	77614
116	James & Mary Dubose	920 CR 4078	Bon Wier	TX	75928
117	James E. Wilson	4142 CR	Deweyville	TX	77614
118	James Edward Brown	219 PVT Rd. 8078	Buna	TX	77612
119	James L. Vincent	3106 West Bluff Road	Orange	TX	77632
120	James Reed, Jr. & Tracy Reed	231 CR 4147	Deweyville	TX	77614
121	Jane Palmer	145 CR 4085	Bon Wier	TX	75928
122	Janice K. Bingle	130 PR 8073	Call	TX	75933
123	Janise Ashworth	4216 FM 1416	Bon Wier	TX	75928
124	Jason & Stacey Verrett	110 Private Road 8955 #9	Orange	TX	77632
125	Jerome D. Norton	CR 2076	Newton	TX	75966
126	Jerome Hanks	4523 FM 1416	Bon Wier	TX	75928
127	Jerry L. Vincent II	3054 FM 3247	Orange	TX	77632
128	Jessica Rosemon	9107 FM 1416	Bon Wier	TX	75928
129	Jessie Harrist	1790 CR 4213	Orange	TX	77632
130	Jimmie N. Williamson	251 Cr 4216	Orange	TX	77632
131	Jimmie Whitfield	2469 CR 4122	Buna	TX	77612
132	Jimmy & Sonya McCain	177 CR 4089	Bon Wier	TX	75928
133	Jimmy Ray Burnitt	4773 West Bluff Road	Orange	TX	77632
134	Joann Hatfield	391 CR 4110	Call	TX	75933
135	Joeseeph Higginbotham	1074 CR 4154	Deweyville	TX	77614
136	John & Elaine Hanner	363 CR 4212	Orange	TX	77632
137	Johnnie D. Levi	609 Cordrey Ave	Orange	TX	77630
138	Jon D. Johnson	P.O. Box 929	Deweyville	TX	77614
139	Joni Smith	2529 CR 4122	Buna	TX	77612
140	Joseph & Theresa Bloodworth	153 PR 1850	Deweyville	TX	77632
141	Joseph E. Wray	CR 4075	Bon Wier	TX	75928
142	Juanita Jones	18898 Hwy. 87 S.	Call	TX	75933
143	Juanita Peveto	132 CR 4149	Deweyville	TX	77614
144	Judy & Cheryl Thompson	1421 CR 4191	Orange	TX	77632
145	Karen Arlene Smith	535 CR 4125	Orange	TX	77632
146	Karen Cutler	411 CR 4960	Orange	TX	77632
147	Karen Lisa Felder	1096 CR 4115	Buna	TX	77612

	A	B	C	D	E
148	Karey & Angela Broussard	341 CR 4165	Deweyville	TX	77614
149	Katherine Thrailkille	4153 West Bluff Road	Orange	TX	77632
150	Kellie Leger	317 CR 4071	Bon Wier	TX	75928
151	Kenneth & Venetta Burch	298 PVT 8105	Orange	TX	77632
152	Kenneth Shivers	2710 Lincoln Street	Vidor	TX	77662
153	Kenneth Willis	181 PR 8104	Orange	TX	77632
154	Keturah Villarreal	467 Spur 272	Deweyville	TX	77614
155	Kimberly Kibodeaux	2501 CR 4191	Bon Wier	TX	77632
156	Kolin Hinds	8446 Dougharty Road	Orange	TX	77632
157	Lainey Bean	357 CR 4171	Deweyville	TX	77614
158	Lance Lowry	1351 CR 4075	Bon Wier	TX	75928
159	Lanny E. Gibson	121 CR 4144	Deweyville	TX	77614
160	Larry & Abigail Brooks	904 Cooper Drive	Orange	TX	77630
161	Larry Lavon Moore	2597 Hwy. 12	Orange	TX	77632
162	Lauren Lockwood	#151 CR 4224	Deweyville	TX	77614
163	Lavan Spence	2613 CR 4122	Buna	TX	77612
164	Lena Jacks	450 CR 4081	Bon Wier	TX	75928
165	Lena Lyons Rich	540 CR 2079	Burkeville	TX	75932
166	Lessie Wiggins	2430 CR 4001	Newton	TX	75966
167	Linda Alfred	8644 FM 1416	Bon Wier	TX	75928
168	Linda George	2406 3rd Street	Orange	TX	77630
169	Linda Villegas	1541 CR 4154	Deweyville	TX	77614
170	Lisa Dulaney POA for Harry C. Sport	1281 PVT RD 8249	Call	TX	75933
171	Lloyd & Cristi Harris	2983 Pea Farm Road	Orange	TX	77632
172	Lois Moore	171 PR 8127	Bon Wier	TX	75928
173	Lois Shoemake	P.O. Box 430	Deweyville	TX	77614
174	Louie David Garlington	195 CR 2080	Burkeville	TX	75932
175	Louis Clifton Jolet	1316 CR 4085	Bonwier	TX	75928
176	Louis Everett Davis	1696 CR 4154	Deweyville	TX	77614
177	Lowell Thompson	1309 CR 4203	Orange	TX	77632
178	Marc Edmiston & Kelly Pargas	526 CR 4110	Call	TX	75933
179	Mark S. Meyers	237 CR 4128	Deweyville	TX	77614
180	Marshall Stephenson	2657 CR 4102	Call	TX	75933
181	Martha Dorsey	815 CR 4078	Bon Wier	TX	75928
182	Mary Balch	10367 Hwy. 190 E.	Bon Wier	TX	75928
183	Mary McKean	2441 State Hwy. 12 E.	Deweyville	TX	77614
184	Mary Simpson	710 North Street	Orange	TX	77630
185	Matthew & Carla Tompkins	198 CR 4203	Deweyville	TX	77614
186	Matthew & Justice Empson	285 CR 4131	Deweyville	TX	77614
187	Melanie Green Wray	280 CR 7111	Call	TX	75933
188	Melissa Odom	391 CR 4110	Call	TX	75933
189	Meredith Stark	1553 Alamo Drive	Orange	TX	77630
190	Micah & Tabitha Fedoroff	1601 CR 4154	Deweyville	TX	77614
191	Micah & Tabitha Fedoroff	1590 CR 4154	Deweyville	TX	77614
192	Michelle & Willie Gilder	228 CR 561	Kirbyville	TX	75956
193	Michelle Johnson	217 CR 4149	Orange	TX	77632
194	Michelle Rawls	700 CR 4070	Bon Wier	TX	75928
195	Misty Jones	160 CR 2003	Bon Wier	TX	75928
196	Modestine Barnes	178 CR 4094	Bon Wier	TX	75928
197	Mollie Williams	156 CR 2003	Bon Wier	TX	75928

	A	B	C	D	E
198	Montreall Easter	97 E. Oregon Street	Orange	TX	77630
199	Nancy Denice Brown	2288 CR 4191	Orange	TX	77632
200	Nicky & Jean Ward	214 Private Road 8074	Call	TX	75933
201	Nina Chaloupka	925 CR 4191	Orange	TX	77632
202	Odis & Diana Hoosier	557 Daffodil	Vidor	TX	77662
203	Orvel & Jadene VanWinkle	501 CR 4129	Orange	TX	77632
204	Oscar & Carey Peet	3264 W. Bluff	Orange	TX	77632
205	Oscar Leblanc	1801 Lincoln Drive	Orange	TX	77630
206	Pamela Williams	289 CR 4146	Deweyville	TX	77614
207	Patricia Frazier	823 CR 4181	Orange	TX	77632
208	Patricia Green	CR 4129 PR 8155	Deweyville	TX	77614
209	Patrick & Brenda Letulle	199 PR 6036	Burkeville	TX	75932
210	Patrick & Melissa Bickham	175 CR 4201	Orange	TX	77632
211	Patsy Hudson	111 CR 4171	Deweyville	TX	77614
212	Patsy Tynes	CR 4149 House # 204	Deweyville	TX	77632
213	Paul Balch	815 CR 4087	Bon Wier	TX	75928
214	Perry Bonin	194 CR 4148	Deweyville	TX	77614
215	Perry Jacob Bonin	194 County Rd 4148	Deweyville	TX	77614
216	Ralph Ocraman	41582 Hwy. 87 S.	Orange	TX	77632
217	Ramona Westbrook	419 CR 4156	Deweyville	TX	77614
218	Raul Diaz, Jr.	2320 3rd Street	Orange	TX	77630
219	Raymond & Jamie Davis	9351 FM 1416	Bon Wier	TX	75928
220	Regina Brown	784 CR 4089	Bon Wier	TX	75928
221	Rita Kellum	8590 FM 1416	Bon Wier	TX	75928
222	Robert & Jacqueline Acreman	518 CR 4110	Call	TX	75933
223	Robert & Laura Green	322 CR 4205	Deweyville	TX	77614
224	Robert & Marilyn Ballast	895 CR 4076	Bonwier	TX	75928
225	Robert & Ruth Green	CR 4158	Deweyville	TX	77614
226	Robert Bickham	162 CR 4156	Deweyville	TX	77632
227	Rodney & Anita Reed	1306 CR 4203	Orange	TX	77632
228	Rodney P. Clark, Sr. & Anna Clark	2923 Kathleen Street	Orange	TX	77630
229	Rodney Whitfield	134 Private Road 8190	Orange	TX	77632
230	Rodrick Lafleur	3905 Peettree Road	Orange	TX	77632
231	Ronald & Telisa Norwood	111 E. Tennessee Street	Orange	TX	77630
232	Ronald L. Green	400 Spur 272	Deweyville	TX	77614
233	Ross & Patricia Stirling	7202 Hwy. 965	Jasper	TX	75951
234	Roy & Charlotte Clark	117 CR 4199	Orange	TX	77632
235	Ruby Foreman Arnold	790 CR 4156	Deweyville	TX	77614
236	Ryan Stoker & Britany Jefferson	2144 CR 4213	Orange	TX	77632
237	Salvador Torres, Jr.	811 CR 4191	Orange	TX	77614
238	Sandra & Joshua Bland	CR 4141	Deweyville	TX	77614
239	Sandra Palmer Lee	190 CR 4085	Bon Wier	TX	75928
240	Scharlene & Jay Rodrick	278 CR 4169	Deweyville	TX	77614
241	Shannon Ratcliff	673 CR 823	Buna	TX	77612
242	Sharon Shepherd	209 PVT 8103	Deweyville	TX	77614
243	Shaunn & Wanda Rosemon	8896 FM 1416	Bon Wier	TX	75928
244	Shelby Tyler	819 CR 4205	Orange	TX	77632
245	Shirley Franklin Horton	335 CR 4960	Deweyville	TX	77614
246	Stephanie Barnes	397 CR 2002	Bon Wier	TX	75928
247	Stephen Keith Lisle	145 CR 4960	Orange	TX	77632

EXHIBIT A

	A	B	C	D	E
248	Steven & Brenda Richard	134 CR 4172	Orange	TX	77632
249	Sue Hollyfield	554 CR 4129	Deweyville	TX	77614
250	Sylvia Rosemon	9107 FM 1416	Bon Wier	TX	75928
251	Tabor Ebner	198 CR 4161	Deweyville	TX	77614
252	Taboris Edgic Joyce	272 CR 2003	Bonwier	TX	75928
253	Tamika Arnold	9365 FM 1416	Bon Wier	TX	75928
254	Ted & Kristina Hickman	1903 CR 4212	Orange	TX	77632
255	Teresa Gilchriest	526 CR 4107	Call	TX	75933
256	Terry Samuel	8655 FM 1416	Bon Wier	TX	75928
257	Thelma Nava	665 FM 1416	Bon Wier	TX	75928
258	Thomas J. Hardin	109 CR 4212	Orange	TX	77632
259	Thomas Wilkerson, Sr. & Bobbie Wilkerson	553 Hwy. 12 E.	Deweyville	TX	77614
260	Tobin Holbrook & Denise Comeaux	151 CR 4133	Deweyville	TX	77614
261	Todd Miller	106 CR 4156	Deweyville	TX	77614
262	Tommy & Evelyn Morris	#132 CR 4161	Deweyville	TX	77614
263	Tommy & Lori Thompson	579 CR 4205	Orange	TX	77632
264	Torrance Ramone Cameron	2112 6th Street	Orange	TX	77630
265	Troy & Emily Letulle	CR 2080	Burkeville	TX	75932
266	Twala S. Dubose	493 CR 4078	Bon Wier	TX	75928
267	Valerie Jones	5911 Armitage Drive	Orange	TX	77632
268	Vergie & Jerry Turner	8583 Vergie Lane	Orange	TX	77632
269	Vernetta Williams	555 CR 4089	Bon Wier	TX	75928
270	Waldean Garrett	362 CR 4216	Orange	TX	77632
271	Wanda Lambright	4161 Daisey Road	Deweyville	TX	77614
272	Wattie Bickman	577 Spur 272	Deweyville	TX	77614
273	Wesley Thompson, Sr.	577 CR 4205	Deweyville	TX	77614
274	Wilbur Eugene Hryhorchuk	2509 CR 4235	Deweyville	TX	77614
275	William & Mary Green	505 Pvt Road	Call	TX	75933
276	William & Shirley Haney	163 PR 8157	Orange	TX	77632
277	William Bell, Jr. & Joanne Bell	1902 CR 2132	Burkeville	TX	75932
278	William Crooks	389 CR 4156	Deweyville	TX	77614
279	William E. Hansen, Jr.	2453 Hwy. 12 East	Deweyville	TX	77614
280	William H. Martinez	101 PR 8215	Orange	TX	77632
281	William Keith Cole	234 CR 4166	Deweyville	TX	77614
282	William Snyder, III & Gabriella Snyder	210 W. Green	Orange	TX	77630
283	William Stouffer	420 CR 4087	Bon Wier	TX	75928
284	Willie Farr, Sr.	10913 FM 1416	Bon Wier	TX	75928
285	Willow Simpson	2500 Country Club	Orange	TX	77630
286	Willow Simpson	906 Cooper	Orange	TX	77630
287	Willow Simpson	2343 Norwood	Orange	TX	77630
288	Willow Simpson	2210 Aldan	Orange	TX	77630

	A	B	C	D	E
1	Name	Primary Address Street	Primary Address City	Primary Address State	Primary Address Postal Code
2	Ace Chandler	1842 Parish Loop	Vinton	LA	70668
3	Alvin Leleux, Sr. & Sandra Leleux	189 Scales Road	Starks	LA	70661
4	Alvin Meshell	5184 Fountain Cemetery Road	Starks	LA	70661
5	Angela East	163 Green Moore Road	Starks	LA	70661
6	Arthur Paige, Jr.	116 Hunter Road	Anacoco	LA	71403
7	Baerbel M. Boykin	1304 Robert Clark Road	Starks	LA	70633
8	Billy G. Gilpatrick	1441 Vanmeter Road	Vinton	LA	70668
9	Brenda Stelly	1488 Robert Clark	Starks	LA	70661
10	Brett McCaughey	3441 Niblets Bluff	Vinton	LA	70668
11	Brian Childress	1397 Robert Clark Road	Starks	LA	70661
12	Caleb Jase Hebert	5304 Gillis Road	Starks	LA	70661
13	Carl F. Barlow, Jr.	1303 East Street	Vinton	LA	70668
14	Carl F. Barlow, Jr.	136 Scales Road	Starks	LA	70661
15	Carolyn Maddox	181 Green Moore Road	Starks	LA	70661
16	Carolyn Pellerin	169 Scales Road	Starks	LA	70661
17	Cassy Marks & Thomas Smith	4669 Arley Myers	Starks	LA	70661
18	Cecil Herring, Jr.	5195 I Fountain Cemetary Rd.	Starks	LA	70661
19	Chester A. Courmier	3004 Spell Road	Vinton	LA	70668
20	Chris Stevison	5304 Gillis Road	Starks	LA	70661
21	Christina Langley	5304 Gillis Road	Starks	LA	70661
22	Clara Mae Jackson	5929 Cormier Cemetery Road	Vinton	LA	70668
23	Clarence William Benoit on behalf of James Arlen Benoit	1774 Norris Road	Vinton	LA	70668
24	Clifton Sims	2951 Spell Road	Vinton	LA	70668
25	Clinton Elmer Harrison III	1780 Arledge Road	Vinton	LA	70668
26	Crystal Hoffpaur & Sonny Smith	244 Green Moore Road	Starks	LA	70661
27	Dale & Mary Reed	2496 Old Hwy. 90	Vinton	LA	70668
28	Daniel Rhodes	1365 Mouth of the Creek Road	Merryville	LA	70653
29	Darren & Sandy Brown	1279 Old River Road	Starks	LA	70661
30	David & Amanda Doyle	5034 Jimmie Doyle Road	Starks	LA	70661
31	David Butts	6144 Stewart Road	Vinton	LA	70668
32	David Foster	3349 Green Island Road	Starks	LA	70661
33	Deborah Welch	183 Scales Road	Starks	LA	70661
34	Debra A. Pharris	1610 Robert Clark Road	Starks	LA	70661
35	Dennis & Kim Buxton	189 Roberts Lane	Singer	LA	70660
36	Don E. Johnson	393 Green Moore Road	Starks	LA	70661
37	Donald Ray Wilkins	1576 Robert Clark Road	Starks	LA	70661
38	Donna Barber	1813 Alex Granger Road	Vinton	LA	70668
39	Donna Marie Duke	3225 Line Road	Vinton	LA	70668
40	Donna Tabor	1645 Arledge Road	Vinton	LA	70668
41	Doris P Herring	5195-I Fountain Cemetary Road	Starks	LA	70661
42	Edda Mobley	6058 Stewart Road	Vinton	LA	70668
43	Eldon Welch, Jr.	1360 Robert Clark Road	Starks	LA	70661
44	Elizabeth N. Bradshaw	1165 Green Moore Road	Starks	LA	70661
45	Elton & Barbara Barks	1720 Mcadio Lark Lane	Vinton	LA	70668

	A	B	C	D	E
46	Elton & Barbara Barks	1094 Robert Clark Road	Vinton	LA	70661
47	Emily Miranda Thompson	1283 Old River Road	Starks	LA	70661
48	Eulice Benoit, Jr.	6090 Stewart Road	Vinton	LA	70668
49	Fulton & Norma Manuel	3188 Niblett Road	Vinton	LA	70668
50	Gary Dean Gray	537 Toro Road	Florien	LA	71429
51	George & Patricia Phillips	1244 Old River Road	Starks	LA	70661
52	George L. Sealy	6023 Cormier Cemetary Road	Vinton	LA	70668
53	George R. Dias	691 Claude Stanley	Starks	LA	70661
54	George W. Burch	1826 Broomes Road	Vinton	LA	70668
55	Harry & Barbara Leger	301 River Camp Road	Evans	LA	70639
56	James & Judy Reeves	223 Scales Road	Starks	LA	70661
57	James & Lee Garrison	1541 Robert Clark Road	Starks	LA	70661
58	James Drummond	1169 & 1175 Robert Clark Road	Starks	LA	70661
59	James E. Brown	203 Scales Road	Starks	LA	70661
60	James Sayers	1985 White Oak	Vinton	LA	70668
61	James Trent Vincent	534 Bass Lake Road	Starks	LA	70661
62	Jason & Barbara Royer	311 Roy Thompson Road	Merryville	LA	70653
63	Jeanie Clark	4891 McMahan Loop	Starks	LA	70661
64	Jennifer & Dennis McKnight	1082 Robert Clark Road	Starks	LA	70661
65	Jimmy A. Young	1742 Snyder Road	Merryville	LA	70653
66	Jimmy Stewart	115 Green Moore Road	Starks	LA	70661
67	Joanna Shull	1765 Arledge Road	Vinton	LA	70668
68	John & Melissa Lucius	1548 Robert Clark Road	Starks	LA	70633
69	Johnny F. Henry	619 Old River Road	Starks	LA	70661
70	Johnny Toney, Jr. & Laura Toney	1685 Arledge Road	Vinton	LA	70668
71	Joseph & Rachael Courtright	2410 Mouth of the Creek Road	Merryville	LA	70634
72	Judith Monceaux	1921 Center Street	Vinton	LA	70668
73	Judy Doyle	4448 Hwy. 12	Starks	LA	70661
74	Justin & Brandy Hanson	1085 Van Meter Road	Vinton	LA	70668
75	Karl Jarrell	6008 South 5th Street	Merryville	LA	70653
76	Kathy Griffin	1304 Robert Clark	Starks	LA	70633
77	Keith & Carolyn Foster	5118 Luster Foster Road	Starks	LA	70661
78	Keith Pickering	1129 Doyle Road	DeQuincy	LA	70633
79	Keith R. Robinson	1651 Wright Road	Vinton	LA	70668
80	Keith Robison	1651 Wright Road	Vinton	LA	70668
81	Keithon & Sherry Perkins	802 Pugh Street	DeQuincy	LA	70633
82	Kelly & Robin Bickham	1671 Arledge Road	Vinton	LA	70668
83	Kenneth & Conadita Cormier	1743 Meadow Park	Vinton	LA	70668
84	Kenneth & Nelwyn Boykin	158 Green Moore Road	Starks	LA	70661
85	Kenneth & Opal Holaway	3874 Hwy. 171	DeRidder	LA	70634
86	Kenneth Ashworth & Lisa Doucet	180 Scales Road	Starks	LA	70661
87	Krystal Herline	3175 Nibletts Bluff Road	Vinton	LA	70668
88	Laura Woods	4867 Lou Farley Road	Starks	LA	70661
89	Lena & David Riggs	1593 Sandlake Road	Merryville	LA	70653
90	Linda B. Keeling	1808 Holden Granger Road	Vinton	LA	70668
91	Linda Martinez	1005 Old River Road	Starks	LA	70661
92	Linda Touns	Lot #1 Stewart Road	Vinton	LA	70668
93	Louis & Ladonna Gibson	4848 McMahan Loop	Starks	LA	70661
94	Marcus D. Gautreaux	3030 Nibletts Bluff Road	Vinton	LA	70668
95	Mark & Karen Crenshaw	4832 McMahan Loop	Starks	LA	70661

	A	B	C	D	E
96	Mark & Karen Crenshaw	1318 Robert Clark Road	Starks	LA	70661
97	Marlene Palis Chaisson	6054 Stewart Road	Vinton	LA	70668
98	Marvin & Jacqueline Poole	3383 Linscomb Road	Vinton	LA	70668
99	Mary Soileau	538 Bass Lake Road	Starks	LA	70661
100	Michael Johnson	1840 Holden Granger	Vinton	LA	70668
101	Michael Quinton	6076 Patricia Lane	Vinton	LA	70668
102	Michael S. Fuselier	631 Digger Franks Road	Merryville	LA	70653
103	Michael Whatley	6166 Stewart Road	Vinton	LA	70668
104	Michael White	4784 Ray Hitt Road	Starks	LA	70661
105	Michelle Weber	5093 Gibson Loop	Starks	LA	70661
106	Mildred White	4788 Ray Hitt Road	Starks	LA	70661
107	Minnie & Willard White	4637 Jim Drake Road	Starks	LA	70661
108	Nina Denise Dyson	566 Humble Road	Merryville	LA	70657
109	Norma Huval Granger	3306 Nibletts Bluff	Vinton	LA	70668
110	Norris Scott Nichols	669 Digger Franks Road	Merryville	LA	70653
111	Penny Brohrer	1157 Robert Clark	Starks	LA	70661
112	Prentice & Carol Buxton	1544 Snyder Road	Merryville	LA	70653
113	Raymond & Lisa Richard	1748 B. Arledge	Vinton	LA	70668
114	Raymond Bussell	4755 Mazilly	Starks	LA	70661
115	Rene Hanks, Jr. & Lucy Hanks	193 Scales	Starks	LA	70661
116	Richard F. Robbins	177 Weaver	Leesville	LA	71446
117	Richard Westbrook	229 Scales Road	Starks	LA	70661
118	Ricky Ashworth	5232 Hwy. 12	Starks	LA	70661
119	Robert & Patricia Olson	150 Coupique Drive	Anacoco	LA	71403
120	Robert Broer & Bonnie Mouton	3329 Niblett Bluff	Vinton	LA	70668
121	Robert E. Tyler, Jr.	232 Shoupique Drive	Anacoco	LA	71403
122	Robert Strenkowski	191 Weaver Road	Leesville	LA	71446
123	Rochelle Ibarra	661 Doe Ridge	Anacoco	LA	71403
124	Roger Douget	498 Bass Lake Road	Starks	LA	70661
125	Ronald & Erma Poole	231 Green Moore	Starks	LA	70661
126	Ronald & Juanita Gillis	4931 Carol Johnson Road	Starks	LA	70661
127	Ronald & Mary Palmer	1585 Wright Road	Vinton	LA	70668
128	Ronald Gillis	Lot 39 Indian Acres River Retreat	Starks	LA	70661
129	Ronnie L. Stevison	5304 Gillis Road House A	Starks	LA	70661
130	Ronny Dugas, Sr. & Mary Dugas	1869 Holden Granger Road	Vinton	LA	70668
131	Roxanne L. Hiner	244 Scales	Starks	LA	70661
132	Samuel Romero	5060 Stewart Road	Vinton	LA	70668
133	Samuel Sparks	151 Scales Road	Starks	LA	70661
134	Selina Jones	Block 1 Lot 4 Stewart Road	Vinton	LA	70668
135	Shelby D. Beassie	6090 Stewart Road	Vinton	LA	70668
136	Shelia O. Guidry	3156 Nibletts Bluff Road	Vinton	LA	70668
137	Sheralon Faye Reed	6116 Stewart Road	Sulphur	LA	70668
138	Sherry Doyle	592 Humble Road	Merryville	LA	70653
139	Sohpia Steitler	5304 Gillis Road House A	Starks	LA	70661
140	Stephen & Pamela Smith	1878 Parish Loop Road	Vinton	LA	70668
141	Susan Suire	3070 Nibletts Bluff	Vinton	LA	70668
142	Tammy Granger	1275 Old River Road	Starks	LA	70661
143	Ted Ray Clark, Jr. & Sabrina Clark	5195 C Fountainn Cemetary Road	Starks	LA	70661
144	Terel & Judy Hines	1580 Indian Acres Road Lot 35	Starks	LA	70661
145	Terry & Renee Bloodworth	174 Scales Road	Starks	LA	70661

	A	B	C	D	E
146	Thor McCaughey	3189 Niblett's Bluff	Vinton	LA	70668
147	Tina Courville	3277 Niblett's Bluff Road	Vinton	LA	70668
148	Travis & Heather Hebert	1748 Arledge	Vinton	LA	70668
149	Trisha Cross D/B/A CEC Boys Camp, LLC	131 Moon Lake Loop	Merryville	LA	70653
150	Vickie S. Hyatt	1264 Old River Road	Starks	LA	70661
151	Virgil Chester	1841 Holden Granger Road	Vinton	LA	70663
152	Wallace & Emma Veillon	1208 Old River Road	Starks	LA	70661
153	Waylon & Kimberly Gillis	4941 Carol Johnson Road	Starks	LA	70661
154	Wendell P. Ardoin	653 Doe Ridge Road	Anacoco	LA	71403
155	William & Jennifer Odom	4844 McMahon Loop	Starks	LA	70661
156	William & Quita Vandergriff	129 Karen Road	Ringgold	LA	71068
157	Willie C. Bradley	4860 Alligator Park Road	Starks	LA	70661
158	Yolande Smith	1067 Old River Road	Starks	LA	70661
159	Yolande Smith	1318 Robert Clark Road	Starks	LA	70661
160	Yolande smith	Camp 1336 Robert Clark Road	Starks	LA	70661

EXHIBIT C

	A	B	C	D	E
1	Name	Primary Address Street	Primary Address City	Primary Address State	Primary Address Postal Code
2	Kenny Davis	529 Wingate Camp Road	Merryville	LA	70653
3	Michael Manuel	1756 Arledge Road	Vinton	LA	70668
4	Billy & Linda Jones	36 Lot 1580 Indian Acre Roa	Starks	LA	70661

EXHIBIT D

	A	B	C	D	E
1	Name	Primary Address Street	Primary Address City	Primary Address State	Primary Address Postal Code
2	Alfred & Patricia Sezer	2315 Riverside Dr.	Orange	TX	77630
3	Alfred & Patricia Sezer	98 W. John Ave	Orange	TX	77630
4	Rebecca Clark & Raymond Cook	CR 4139	Deweyville	TX	77614
5	Verless & Sylvia Stewart	332 Avenue F	Nederland	TX	77627

EXHIBIT 5

	A	B	C	D	E
1	Name	Primary Address Street	Primary Address City	Primary Address State	Primary Address Postal Code
2	Arlanda Fields	9362 FM 1416	Bon Wier	TX	75928
3	Choyce & Mary Lou Gandy	754 PR 8125	Newton	TX	79566
4	Timothy Reddish	9400 FM 1416	Bon Wier	TX	75928

CAUSE NO. B160137-C

PERRY BONIN, ACE CHANDLER	:	IN THE DISTRICT COURT
and MICHAEL MANUEL, ET AL	:	
	:	
VERSUS	:	ORANGE COUNTY, TEXAS
	:	
SABINE RIVER AUTHORITY OF	:	
TEXAS and SABINE RIVER	:	
AUTHORITY OF LOUISIANA	:	163rd JUDICIAL DISTRICT

SPECIAL APPEARANCE

Pursuant to Rule 120a of the Texas Rules of Civil Procedure, the Sabine River Authority, State of Louisiana, incorrectly named as the Sabine River Authority of Louisiana, files this Special Appearance for the purpose of objecting to the jurisdiction of this Court, and as grounds therefore would show the Court the following:

1. This Special Appearance is made to the entire proceeding and is filed prior to any other plea, pleading or motion.
2. The Sabine River Authority, State of Louisiana is an agency of the State of Louisiana. *See* La. R.S. 38:2324A, which provides: “The Sabine River Authority is hereby declared to be an agency and instrumentality of the state of Louisiana required by the public convenience and necessity for the carrying out of the functions of the state.”
3. The Sabine River Authority, State of Louisiana, an agency of the State of Louisiana and subject to the Special Appearance, is filing a Motion to Dismiss this suit on the basis that principles of comity require this Honorable Court to recognize and give effect to the mandatory venue provisions of La. R.S. 13:5106A, which provides: “No suit against

the state or a state agency or political subdivision shall be instituted in any court other than a Louisiana state court.”

4. Comity principles require this Court to decline jurisdiction over the Sabine River Authority, State of Louisiana. *See, e.g., K.D.F. v. Rex*, , 878 S.W.2d 589 (Tex. 1994); and *Hawsey v. Louisiana Dept. of Social Services*, 934 S.W.2d 723 (Tex.App.–Houston [1st Dist.] 1996, *writ denied*).

In consideration of the foregoing, the Sabine River Authority, State of Louisiana requests that this Special Appearance be set for hearing and, that upon such hearing, its objection to jurisdiction be sustained and Plaintiffs’ claims against the Sabine River Authority, State of Louisiana be dismissed for lack of jurisdiction.

Respectfully Submitted,
KEOGH, COX & WILSON, LTD.

By: /s/ John P. Wolff, III
JOHN P. WOLFF, III
Texas State Bar No. 793161
701 Main Street
Post Office Box 1151
Baton Rouge, Louisiana 70821
Telephone: (225) 383-3796
Facsimile: (225) 343-9612
Email: jwolff@keoghcox.com
Attorney for Sabine River Authority, State of Louisiana

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the above and foregoing has been served this day upon all known counsel of record by placing a copy in the United States Mail, properly addressed and postage prepaid, and/or by electronic transmission and/or facsimile transmission.

Baton Rouge, Louisiana, this 26th day of May, 2016.

/s/John P. Wolff, III


JOHN P. WOLFF, III

VERIFICATION

Before me, the undersigned authority, on this day personally came and appeared John P. Wolff, III, who, being by me first duly sworn, stated that:


1. He is one of the attorneys representing the Sabine River Authority of Louisiana in this matter;

2. He has read the above and foregoing Special Appearance and the information set forth therein is true and correct.



JOHN P. WOLFF, III

Subscribed and sworn before me, Notary,
this 26th day of May, 2016.



Notary Public
My commission expires: at death

Virginia Jordan McLin
Notary Public #87077
Bar Roll #31257
State of Louisiana
My Commission is for Life

PERRY BONIN, ACE CHANDLER and MICHAEL MANUEL, ET AL	:	IN THE DISTRICT COURT By: Denise Smith, Deputy
	:	
VERSUS	:	ORANGE COUNTY, TEXAS
	:	
SABINE RIVER AUTHORITY OF TEXAS and SABINE RIVER AUTHORITY OF LOUISIANA	:	163rd JUDICIAL DISTRICT

MOTION TO DISMISS FOR LACK OF JURISDICTION

NOW INTO COURT, though undersigned counsel, comes the SABINE RIVER AUTHORITY, STATE OF LOUISIANA who, pursuant to Rule 120a of the Texas Rules of Civil Procedure, makes this special appearance solely for the purpose of asserting its plea to the jurisdiction of this court and challenging the jurisdiction of this court. It is respectfully submitted that this court does not have jurisdiction over the claim against the Sabine River Authority, State of Louisiana for the following reasons, to wit:

1.

The Sabine River Authority, State of Louisiana is an agency of the State of Louisiana. *See* La. R.S. 38:2324A, which provides in pertinent part: “The Sabine River Authority is hereby declared to be an agency and instrumentality of the state of Louisiana.”

2.

Louisiana law requires that all suits against a Louisiana state agency be brought in a Louisiana state court. *See* La. R.S. 13:5106A, which provides: “No suit against the state or a state agency or political subdivision shall be instituted in any court other than a Louisiana state court.”

3.

The venue limitation for this suit against the Sabine River Authority, State of Louisiana should be recognized on the basis of comity principles. *See, e.g., K.D.F. v. Rex*, 878 S.W.2d 589, 593 (Tex. 1994); *Hawsey v. Louisiana Dept. of Social Services*, 934 S.W.2d 723 (Tex.App.–Houston [1st Dist.] 1996, writ denied); and *Cason v. E.I. Dupont de Nemours & Co.*, No. 01-94-01191-CV, 1997 WL 69858 (Tex.App.–Houston [1st Dist.] 1997, pet. denied) (not designated for publication).

For all of these reasons, as more fully discussed in the accompanying memorandum, the Motion to Dismiss filed upon the Special Appearance of the Sabine River Authority, State of Louisiana should be granted and, thereby, Plaintiffs' claims against the Sabine River Authority, State of Louisiana be dismissed.

Respectfully Submitted,
KEOGH, COX & WILSON, LTD.

By: /s/ John P. Wolff, III
JOHN P. WOLFF, III
Texas State Bar No. 793161
701 Main Street
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Facsimile: (225) 343-9612
Email: jwolff@keoghcox.com
Attorney for Sabine River Authority, State of Louisiana

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the above and foregoing has been served this day upon all known counsel of record by placing a copy in the United States Mail, properly addressed and postage prepaid, and/or by electronic transmission and/or facsimile transmission.

Baton Rouge, Louisiana, this 26th day of May, 2016.

/s/ John P. Wolff, III

JOHN P. WOLFF, III

CAUSE NO. B160137-C

PERRY BONIN, ACE CHANDLER	:	IN THE DISTRICT COURT
and MICHAEL MANUEL, ET AL	:	
	:	
VERSUS	:	ORANGE COUNTY, TEXAS
	:	
SABINE RIVER AUTHORITY OF	:	
TEXAS and SABINE RIVER	:	
AUTHORITY OF LOUISIANA	:	163rd JUDICIAL DISTRICT

**MEMORANDUM IN SUPPORT OF
MOTION TO DISMISS FOR LACK OF JURISDICTION**

The SABINE RIVER AUTHORITY, STATE OF LOUISIANA brings this motion, by special appearance, to obtain its dismissal from this suit for lack of jurisdiction.

The Sabine River Authority, State of Louisiana is an agency of the State of Louisiana. *See* La. R.S. 38:2324A, which provides in pertinent part: “The Sabine River Authority is hereby declared to be an agency and instrumentality of the state of Louisiana.” As a state agency, Louisiana law requires that any suit against it must be brought in a Louisiana state court. *See* La. R.S. 13:5106A, which provides: “No suit against the state or a state agency or political subdivision shall be instituted in any court other than a Louisiana state court.” The venue limitation for suits against the Sabine River Authority, State of Louisiana, as provided for by Louisiana law, should be given recognition and effect on the basis of comity principles. Additionally, the Sabine River Authority, State of Louisiana was not properly served with the suit pursuant to La. R.S. 38:2324.¹

¹ §2324 requires that service on the Sabine River Authority be made on the chairman of the board of commissioners. Plaintiffs served the Original Petition upon a board member who is not the chairman.

Comity is a “principle under which the courts of one state give effect to the laws of another state or extend immunity to a sister sovereign not as a rule of law, but rather out of deference or respect.” *Hawsey v. Louisiana Dept. of Social Services*, 934 S.W.2d 723, 726 (Tex.App.–Houston [1st Dist.] 1996, writ denied).

Hawsey, *supra*, involved a suit brought in a Texas state court against the Louisiana Department of Social Services. The court found, under comity principles, that it should decline jurisdiction over this Louisiana state agency under La. R.S. 13:5106A, the same venue limiting statute at issue in this case. Reviewing case law, it instructed that “Texas should extend comity by recognizing the laws and judicial decisions of other states unless: (1) the foreign state declines to extend comity to Texas or sister states under the same or similar circumstances; or (2) the foreign statute produces a result in violation of this state’s own legitimate public policy.” *Id.*² The *Hawsey* Court found both of these requirements satisfied and, therefore, extended comity and declined jurisdiction. The same result is warranted in this case.

² In this regard, the *Hawsey* Court cited to *K.D.F. v. Rex*, 878 S.W.2d 589, 594 (Tex. 1994) (“because comity is grounded in cooperation and mutuality, Texas should not extend comity to another state so long as that state declines to extend comity to Texas or other states under the same or similar circumstances ... [and it] will extend comity to the law of a cooperative jurisdiction so long as that law does not violate Texas public policy”); and *Lee v. Miller Cty., Ark.*, 800 F.2d 1372, 1375 (5th Cir. 1986) (reviewing the leading opinion of the Texas Supreme Court dealing with comity, court recognizes that “Texas courts will recognize another state’s law unless it is repugnant to Texas public policy”).

1. Louisiana is a Cooperative Jurisdiction for Purposes of Applying Comity.

A state is treated as a “cooperative jurisdiction,” i.e., a state that extends comity to Texas or other sister states, unless there is a clear indication to the contrary. *K.D.F., supra*, 878 S.W.2d at 595; *Hawsey, supra*, 934 S.W.2d at 726. The *Hawsey* Court found no case that demonstrated Louisiana had refused to extend comity to Texas, and it identified several cases in which Louisiana extended comity to other states. *See, e.g., Succession of Fisher*, 103 So.2d 276, 281 (La. 1958) (“the spirit of comity existing between the several states of our country requires that Louisiana recognize ... Massachusetts law”); and *Fisher v. Bullington*, 65 So.2d 880, 882 (La. 1953) (through comity, court gives effect to Arkansas law in order to recognize a conditional sale). On this basis, the Court determined that it would “treat Louisiana as a cooperative jurisdiction for purposes of applying comity.” *Hawsey*, 934 S.W.2d at 726. Similarly, in *Cason v. E.I. Dupont de Nemours & Co.*, No. 01-94-01191-CV, 1997 WL 69858 (Tex.App.–Houston [1st Dist.] 1997, pet. denied) (not designated for publication), the Texas court determined Louisiana is a “cooperative sister state” given its history of extending comity, and as a result it gave effect to La. R.S. 13:5104’s limitation on venue and sustained Louisiana State University’s plea to the jurisdiction.

This same result should be had in this case. Since the time *Hawsey* and *Cason* were decided, Louisiana Courts have continued to extend comity to other states. For example, in *Lever v. Univ. of Illinois at Urbana/Champaign ex rel. Bd. of Trustees*, 2002-2679 (La. App. 1 Cir. 9/26/03), 857 So.2d 611, 622, *writ denied*, 2003-2994 (La. 1/16/04), 864 So.2d 635,

the Louisiana court extended comity by honoring Illinois's sovereign immunity laws and, thereby, declining jurisdiction. On the basis of the above cases, this court should find that Louisiana is a cooperative jurisdiction for purposes of applying comity.

2. Louisiana's venue limiting statute does not violate Texas public policy.

Moreover, the specific Louisiana law at issue was previously found by the *Hawsey* and *Cason* Courts to not violate any public policies of Texas. Their decision was based on *K.D.F. v. Rex, supra*, a decision by the Texas Supreme Court that dealt with the same type of venue limiting statute. In *K.D.F.*, suit was brought in Texas against the Kansas Public Employees' Retirement System ("KPERs"), a Kansas state agency, and the Texas Supreme Court was required to determine whether Texas public policy was violated by the Kansas law that required suits against KPERs to be brought solely in Shawnee County, Kansas. It found that Texas public policy was *not* violated by a statute, such as the one at issue in this case, that limited the venue for suits against a state agency:

The Kansas mandatory venue statute does not violate any public policy. Indeed, Texas has similar statutes that serve the same purpose the Kansas statute advances – minimizing the litigation costs that taxpayers must bear by providing state agencies with a convenient venue in which to litigate.

K.D.F., supra, 878 S.W.2d at 595.

In like manner, this Court should find that La. R.S. 13:5104(A) does not violate any Texas public policies.

CONCLUSION

Because Louisiana is a cooperative sister state for purposes of applying comity, and the application of La. R.S. 13:5104(A) does not violate any public policies of Texas, comity should be extended. Effect should therefore be given to La. R.S. 13:5104(A), under which this suit against the Sabine River Authority, State of Louisiana, a Louisiana state agency, must be instituted in a Louisiana state court. This Texas state court is, therefore, without jurisdiction. Accordingly, this Motion to Dismiss to dismiss should be granted and Plaintiffs' claims against the Sabine River Authority, State of Louisiana be dismissed.

Respectfully Submitted,

KEOGH, COX & WILSON, LTD.

By: /s/ John P. Wolff, III

JOHN P. WOLFF, III

Texas State Bar No. 793161

701 Main Street

Post Office Box 1151

Baton Rouge, Louisiana 70821

Telephone: (225) 383-3796

Facsimile: (225) 343-9612

Email: jwolff@keoghcox.com

Attorney for Sabine River Authority, State of Louisiana

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the above and foregoing has been served this day upon all known counsel of record by placing a copy in the United States Mail, properly addressed and postage prepaid, and/or by electronic transmission and/or facsimile transmission.

Baton Rouge, Louisiana, this 26th day of May, 2016.

/s/ John P. Wolff, III

JOHN P. WOLFF, III

CAUSE NO. B160137-C

PERRY BONIN, ACE CHANDLER	:	IN THE DISTRICT COURT
and MICHAEL MANUEL, ET AL	:	
VERSUS	:	ORANGE COUNTY, TEXAS
SABINE RIVER AUTHORITY OF	:	
TEXAS and SABINE RIVER	:	
AUTHORITY OF LOUISIANA	:	163rd JUDICIAL DISTRICT

NOTICE OF HEARING ON
DEFENDANT'S SPECIAL APPEARANCE and
MOTION TO DISMISS FOR LACK OF JURISDICTION

PLEASE TAKE NOTICE that the hearing on **Defendant's Special Appearance and Motion to Dismiss for Lack of Jurisdiction** has been scheduled for **Wednesday, July 6, 2016 at 9:30 a.m.** in the 163rd Judicial District Court of Orange County, Texas.

Respectfully Submitted,

KEOGH, COX & WILSON, LTD.

By: /s/ John P. Wolff, III

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CERTIFICATE OF SERVICE

I do hereby certify that I have on this 26th day of May, 2016, electronically served a copy of the foregoing Special Appearance on counsel for all parties to this proceeding, as follows:

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Counsel of Plaintiffs

/s/ John P. Wolff, III

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